



Control Number: 51415



Item Number: 350

Addendum StartPage: 0

SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415



APPLICATION OF SOUTHWESTERN
ELECTRIC POWER COMPANY FOR
AUTHORITY TO CHANGE RATES

§
§
§
§

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

DIRECT TESTIMONY AND ATTACHMENTS

OF

CATHERINE J. WEBKING

REGARDING RATE CASE EXPENSES

ON BEHALF OF

CITIES ADVOCATING REASONABLE DEREGULATION

APRIL 8, 2021

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR AUTHORITY TO CHANGE RATES	§ § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
---	----------------------------	---

**DIRECT TESTIMONY AND ATTACHMENTS OF CATHERINE J. WEBKING
REGARDING RATE CASE EXPENSES**

TABLE OF CONTENTS

I.	INTRODUCTION AND BACKGROUND	2
II.	PURPOSE AND SCOPE.....	3
III.	REASONABLENESS OF LEGAL FEES AND EXPENSES	4
IV.	REASONABLENESS OF EXPERT FEES AND EXPENSES	6
V.	CONCLUSION.....	7

ATTACHMENTS

CJW-1	Resume of Catherine J. Webking
CJW-2	Affidavit of Alfred R. Herrera Related to Rate Case Expenses Incurred by Cities Advocating Reasonable Deregulation

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR AUTHORITY TO CHANGE RATES	§ § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
---	------------------	---

**DIRECT TESTIMONY AND ATTACHMENTS OF CATHERINE J. WEBKING
REGARDING RATE CASE EXPENSES**

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, OCCUPATION, AND ADDRESS.

A. My name is Catherine J. Webking and I am a partner at the law firm of Scott, Douglass & McConnico LP. My office address is 303 Colorado St. Suite 2400, Austin, TX 78701.

Q. PLEASE DESCRIBE YOUR OCCUPATION AND EDUCATIONAL BACKGROUND.

A. I am an attorney in good standing with the State Bar of Texas and have been practicing continually since receiving my license to practice law in Texas in 1991. I graduated with a Bachelor of Science in Chemical Engineering from Texas A&M University in 1985. After working as an engineer with a major oil and gas company for a few years, I continued my education at the University of Texas School of Law where I earned a Doctorate of Jurisprudence with honors in 1991.

Particularly, I have extensive practice in the area of public utility law and have practiced before the Public Utility Commission of Texas and the State Office of Administrative Hearings for the entirety of my legal practice. I have represented a variety of parties in contested cases involving electric rates, rulemakings and other contested case proceedings. My resume is included with this testimony as Attachment CJW-1.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

A. I am testifying on behalf of the Cities Advocating Reasonable Deregulation (“CARD”) with regard to the rate case expenses for which they seek reimbursement in this proceeding and the additional proceedings I note below. CARD is a coalition of municipalities that

1 was formed to address the regulatory authorities' concerns with, and interest in, utility rates,
2 services, and operations. CARD, its residents, and businesses located within city limits
3 ultimately pay the rates that result from this proceeding and the other proceedings for which
4 recovery of rate case expenses is sought herein. CARD is a coalition of municipalities
5 located in Southwestern Electric Power Company's ("SWEPCO") service area.

6 **Q. ARE YOU FAMILIAR WITH THE RATE CASE EXPENSES WHICH CARD**
7 **SEEKS TO RECOVER IN THIS PROCEEDING?**

8 A. Yes. I have reviewed those expenses and am familiar with the underlying proceedings to
9 which they relate.

10 **Q. HAVE YOU EVER TESTIFIED BEFORE THE PUBLIC UTILITY COMMISSION**
11 **BEFORE?**

12 A. Yes, I have provided testimony on rate case expenses in PUC Docket No. 47141; *Review*
13 *of Rate Case Expenses Incurred by Southwestern Electric Power Company and*
14 *Municipalities in Docket No. 46449*; PUC Docket No. 49831; *Application of Southwestern*
15 *Public Service Company for Authority to Change Rates* and in PUC Docket No. 50997
16 *Application of Southwestern Public Service Company for Authority to Reconcile Fuel*
17 *Costs*.

18 **II. PURPOSE AND SCOPE**

19 **Q. WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY?**

20 A. The purpose and scope of my testimony is to identify and assess the reasonableness of the
21 rate case expenses incurred on behalf of CARD in this proceeding. My testimony describes
22 my review of those expenses and my determination of the reasonableness of those
23 expenses. In addition, this case includes consideration of some rate case expenses incurred
24 in the following additional proceedings:

- 25 • *PUC Docket No. 50997, Application of Southwestern Electric Power Company*
26 *for Authority to Reconcile Fuel Costs*;
- 27 • *PUC Docket No. 49042, Application of Southwestern Electric Power Company*
28 *to Amend Its Transmission Cost Recovery Factor*;
- 29
- 30

- *PUC Docket No. 47141, Review of Rate Case Expenses Incurred by Southwestern Electric Power Company and Municipalities in Docket No. 46449;*
- *PUC Docket No. 46449, Application of Southwestern Electric Power Company for Authority to Change Rates;*
- *PUC Docket No. 40443, Application of Southwestern Electric Power Company for Authority to Change Rates and Reconcile Fuel Costs;*

I have reviewed the Affidavit of Alfred R. Herrera included with my testimony as Attachment CJW-2 describing the specific expenses at issue and the nature of the underlying work performed.

Q. WHAT FACTORS DID YOU CONSIDER IN REVIEWING THE REASONABLENESS OF THE LEGAL AND PROFESSIONAL FEES AND EXPENSES?

A. I have reviewed the fees and expenses under the standards set out by the Commission in 16 Tex. Admin. Code § 25.245 (“TAC”). Based on these standards, I recommend that the Commission determine that CARD’s expenses are reasonable and recoverable under Public Utility Regulatory Act, Tex. Util. Code §33.023.

III. REASONABLENESS OF LEGAL FEES AND EXPENSES

Q. WHAT ARE THE LEGAL FEES AND EXPENSES FOR WHICH CARD SEEKS REIMBURSEMENT?

A. CARD was represented by the law firm Herrera Law & Associates, PLLC in Docket No. 51415 and the additional proceedings noted above. The legal services were performed by Mr. Alfred R. Herrera and his associates and legal assistants. The fees and expenses billed by Herrera Law & Associates, PLLC are the legal expenses and fees for which CARD seeks reimbursement.

Q. HAVE YOU REVIEWED THOSE FEES AND EXPENSES AND DETERMINED THAT THEY ARE REASONABLE?

A. Yes. Based on my review of the fees and expenses charged by the firm Herrera Law & Associates, PLLC, I have determined that the legal fees and expenses for which CARD seeks recovery are reasonable. I have reviewed the hourly rates and the time spent given

1 the complexity of the issues in Docket No. 51415. In addition, and consistent with my
2 previous testimony, I have reviewed the legal expenses for CARD in the other dockets
3 listed above for which rate case expenses are included in this case on a consolidated basis.
4 Based on the active participation of Herrera Law & Associates, PLLC and the experience
5 of the attorneys and other legal staff for the firm who contributed to the cases, I have
6 determined that the legal fees and expenses identified above are reasonable, not excessive,
7 and not duplicative.

8 I have personal knowledge of the legal skills and experience of Mr. Herrera and his
9 associates and have participated in numerous contested cases where we both represented
10 parties involved in complex contested cases before SOAH and the PUC. Given Mr.
11 Herrera's extensive experience and the experience of the other attorneys who billed time
12 to these cases, it is my opinion that the hourly rates for the legal services performed are in
13 the low to mid-range of billing rates of other attorneys in this practice area. The hourly
14 rates billed are reasonable and compare favorably to the rates of other attorneys
15 representing municipalities in similar contested rate cases.

16 SWEPCO has approximately 187,000 Texas retail customers. All such customers and all
17 classes of customers will be affected by the rate increase requested in Docket No. 51415.
18 SWEPCO has proposed a complicated set of changes to their rate structure that would
19 result in a proposed increase of 26% over the base rates (exclusive of fuel and riders). If
20 you consider the fuel and non-fuel revenues, the increase is still more than 15%. The
21 proposed increase to certain classes of customers is even larger. This is a very large
22 proposed increase and CARD's efforts are commensurate with the magnitude of issues
23 involved. CARD represents the only active group of municipalities in this case that are
24 included in this request for rate case expense recovery. At the time of preparation of this
25 testimony, CARD developed and served twelve sets of discovery requests on SWEPCO in
26 this proceeding. In addition, CARD has overseen the preparation of and will submit direct
27 testimony from six witnesses. For this proceeding, CARD has appropriately allocated its
28 time for each substantive issue and phase of the case as required by 16 Tex. Admin. Code
29 § 25.245(b)(6).

1 The level of participation of CARD in the other cases identified above is also
2 commensurate with the scope and complexity of the issues and the amount of SWEPCO's
3 costs that were under consideration in those rate proceedings and related appeals.

4 The final expenses for this proceeding are not yet known, but will be updated as the case
5 progresses.

6 **IV. REASONABLENESS OF PROFESSIONAL FEES AND EXPENSES**

7 **Q. WHAT ARE THE PROFESSIONAL FEES AND EXPENSES FOR WHICH CARD**
8 **SEEKS REIMBURSEMENT?**

9 A. The professional fees and expenses of the following consulting firms and expert witnesses
10 are the professional fees for which CARD seeks reimbursement.

Consulting Firm	Expert Witness
Norwood Energy Consulting	Scott Norwood
ReSolved Energy Consulting	Karl Nalepa
Energy Ventures Alliance	Seth Schwartz
Garrett Group Consulting, Inc.	Mark E. Garrett
Resolve Utility Consulting, PLLC	David J. Garrett
	J. Randall Woolridge
	Catherine Webking

11
12 **Q. HAVE YOU REVIEWED THOSE FEES AND EXPENSES AND DETERMINED**
13 **THAT THEY ARE REASONABLE?**

14 A. Yes, I have reviewed these fees and expenses and have determined them to be reasonable.
15 Each of the experts above contributed to development of and analysis of discovery requests
16 filed by CARD. Further, each expert contributed in the substantive technical review of
17 the Application in this proceeding and the development of direct testimony. It is
18 anticipated that each expert will be providing testimony in this proceeding. Each expert-

witness firm's recorded billings are based on reasonable hourly rates and their total billings to the Commission's legal standards. I have also reviewed each firm's expenses, which were supported with reasonable detail and were not excessive or duplicative.

V. CONCLUSION

I have reviewed the legal and professional fees and expenses for which CARD seeks reimbursement and have found them to be reasonable under the applicable legal standards. I conclude that the hourly rates and expenses for legal and professional fees which are detailed in Exhibit CJW-2 are reasonable to support CARD's participation in this proceeding. Accordingly, the total rate case expenses that are reasonable for reimbursement for CARD through March 31, 2021 in this proceeding and the other proceedings noted above is \$648,985.96. As this case progresses, it is expected that additional rate case expenses will be reasonably incurred.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

DIRECT TESTIMONY AND ATTACHMENTS

OF

CATHERING J. WEBKING

ATTACHMENT CJW-1

Resume of Catherine J. Webking

**Catherine J. Webking
Curricula Vitae**

Legal Experience

Law practice encompasses advocacy in Texas regulatory matters, especially in the areas of public utility law involving electricity, telecommunications, water, and natural gas. More than 25 years of law practice result in a deep understanding of Texas' utility regulatory environment and its migration to competitive services in the relevant markets. This experience involves extensive contested case hearing experience and other regulatory matters before the Public Utility Commission of Texas, the Railroad Commission of Texas, and the State Office of Administrative Hearings.

2016 – Present	Scott, Douglass, & McConnico LP, Partner
2012 – 2015	Gardere Wynne Sewell LLP, Partner
1999 – 2011	Webking McClendon, PC, Principal (formerly Catherine J. Webking Law Offices)
1997 – 1999	Akin, Gump, Strauss, Hauer, & Feld, LP
1995 – 1997	Haynes and Boone, LP
1991 – 1995	McGinnis, Lochridge, & Kilgore, LP

Recognition and Awards

Chambers USA – Energy: Texas State Regulatory & Litigation (Electricity)

Best Lawyers in America

Order of the Coif

Bar Admissions & Activities

Fellow, Texas Bar Foundation
State Bar of Texas – Administrative Law Section
Travis County Bar Association – Public Utility Law Section
Gulf Coast Power Association

Education

Texas A&M University, B. S., Chemical Engineering
University of Texas Law School, J. D., with honors, 1991

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

DIRECT TESTIMONY AND ATTACHMENTS

OF

CATHERING J. WEBKING

ATTACHMENT CJW-2

**Affidavit of Alfred R. Herrera Related to Rate Case Expenses Incurred by
Cities Advocating Reasonable Deregulation**

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
---	----------------------	---

**AFFIDAVIT OF ALFRED R. HERRERA RELATED TO RATE CASE EXPENSES
INCURRED BY CITIES ADVOCATING REASONABLE DEREGULATION**

**STATE OF TEXAS §
 §
COUNTY OF TRAVIS §**

Before me, the undersigned authority, on this day personally appeared Alfred R. Herrera, being by me first duly sworn, on oath deposed and said the following:

1. My name is Alfred R. Herrera, and I am over 18 years of age and I am not disqualified from making this affidavit. My statements are true and correct.
2. I am the principal and founder of Herrera Law & Associates, PLLC ("HLA"). I have over 38 years of experience in legal and legislative matters related to the utility industry (gas, electric, water, wastewater, and telecommunications) and have held positions at the Public Utility Commission of Texas ("PUC"), the City Attorney's Office for the City of Austin, and for a major telecommunications corporation. I have litigated numerous utility-related rate matters in the electric, telecommunications, gas, and water/wastewater industries.
3. The Cities Advocating Reasonable Deregulation ("CARD") retained Herrera Law & Associates in connection with *PUC Docket No. 51415, Application of Southwestern Electric Power Company for Authority to Change Rates*.
4. CARD also retained Herrera Law & Associates in connection with the following proceedings:
 - A. *PUC Docket No. 50997, Application of Southwestern Electric Power Company for Authority to Reconcile Fuel Costs;*
 - B. *PUC Docket No. 49042, Application of Southwestern Electric Power Company to Amend Its Transmission Cost Recovery Factor;*
 - C. *PUC Docket No. 47141, Review of Rate Case Expenses Incurred by Southwestern Electric Power Company and Municipalities in Docket No. 46449;*
 - D. *PUC Docket No. 46449, Application of Southwestern Electric Power Company for Authority to Change Rates;*

E. *PUC Docket No. 40443, Application of Southwestern Electric Power Company for Authority to Change Rates and Reconcile Fuel Costs;*

5. The firm of Herrera Law & Associates, PLLC provided services to CARD in the dockets I note above including, but not limited to, the following activities: the provision of legal advice and strategy; negotiating schedules and substantive issues; identification of consultants and recommendations to CARD regarding engagement of consultants; coordination of issue development; legal research; preparation and filing of pleadings, briefs, discovery and pre-filed testimony; preparation for and participating in prehearing conferences, hearings on the merits and Open Meetings; preparation of appellate briefs and appearance at oral argument; and briefing clients and discussions with consultants.
6. I am familiar with the work performed by Herrera Law & Associates, PLLC and the technical consultants engaged on behalf of CARD in connection with the proceedings I note above. I am responsible for coordinating and supervising the efforts of my firm's personnel pertaining to the services rendered to CARD in the dockets I note above. I have personally reviewed the billings for all work performed (legal and consulting) in connection with the proceedings I note above.
7. Herrera Law & Associates, PLLC transmits our firm's and consultants' invoices and backup materials showing the fees and expenses related to the proceedings I note above to the City of Longview for review and approval. The City of Longview makes available those invoices to the CARD Steering Committee for its review. Once that review is completed, the City of Longview forwards the approved invoices to Southwestern Electric Power Company ("SWEPCO") for reimbursement. My firm's billings are reasonable and necessary for development of the record and advocacy of CARD's position on the issues in the cases I note above. My firm's and consultants' invoices accurately reflect the time expended and the expenses incurred by HLA and the consultants that worked on matters related to the cases noted above. As a matter of standard operating procedure, we avoid the duplication of effort in providing our services to CARD.
8. My firm's billing rates for governmental clients for our attorneys ranges from \$250.00 to \$485.00 per hour. My current billing rate is \$485.00 per hour. These billing rates are reasonable, consistent with the rates billed to other governmental clients for similar work, and comparable to rates charged by other professionals with the same level of expertise and experience. Herrera Law & Associates, PLLC's rates are at the low- to mid-range of reasonable hourly rates compared to the rates charged by other lawyers with similar experience providing similar services.
9. ***PUC Docket No. 51415 (Application for Authority to Change Rates):*** For the period October 15, 2020 through March 31, 2021, Herrera Law & Associates billed \$381,126.70 related to *PUC Docket No. 51415*. This figure includes \$164,084.70 in legal fees and expenses, and \$217,042.00 in consultant fees and expenses. The time and resources expended and expenses incurred were necessary to advise CARD regarding SWEPCO's application, review the application, identify issues, coordinate activities, retain and work with consultants, engage in discovery, draft pleadings, and prepare for and attend pre-hearing conferences. A summary of CARD's rate case expenses for *PUC Docket No. 51415*

are appended to my affidavit as Exhibit A. Invoices for *PUC Docket No. 51415* are provided at Exhibit B. An Excel spreadsheet showing CARD's time spent for each substantive issue and procedural phase of Docket No. 51415 is attached as Exhibit B-1.

10. ***PUC Docket No. 50997 (Application for Authority to Reconcile Fuel Costs)***: The majority of CARD's rate-case expenses related to Docket No. 50997 are addressed in my affidavit submitted in that proceeding. To the extent not addressed in Docket No. 50997, I have updated my affidavit to include those additional rate case expenses in this proceeding, Docket No. 51415. For the period January 1, 2021 through March 31, 2021, Herrera Law & Associates billed \$133,434.50 in fees and \$1,609.54 in legal expenses, and \$71,841.00 in consultants' fees and expenses related to *PUC Docket No. 50997* for a total of \$206,885.04. The time and resources expended and expenses incurred were necessary to conduct discovery, prepare testimony, engage in settlement negotiations, and prepare settlement documents, and prepare for the hearing on the merits. A summary of CARD's rate case expenses for *PUC Docket No. 50997* are appended to my affidavit as Exhibit A. Invoices for *PUC Docket No. 50997* are provided at Exhibit C.
11. ***PUC Docket No. 49042 (Application for Authority to Amend Its Transmission Cost Recovery Factor)***: For the period December 2018 through July 31, 2019, Herrera Law & Associates billed \$41,462.67 related to *PUC Docket No. 49042*. This figure includes \$27,203.67 in legal fees and expenses, and \$14,259.00 in consultant fees and expenses. The time and resources expended and expenses incurred were necessary to advise CARD regarding SWEPCO's application, review the application, identify issues, coordinate activities, retain and work with consultants, engage in discovery, draft pleadings, prepare testimony, conduct settlement negotiations, draft settlement documents, and prepare for and attend pre-hearing conferences and Open Meetings. A summary of CARD's rate case expenses for *PUC Docket No. 49042* are appended to my affidavit as Exhibit A. Invoices for *PUC Docket No. 49042* are provided at Exhibit D.
12. ***PUC Docket No. 47141 (Application for Authority to Change Rates-Review of Rate Case Expenses Related to Docket No. 46449)***: For the period April 13, 2020 through August 31, 2020, Herrera Law & Associates billed \$6,320.50 related to *PUC Docket No. 47141*. This figure includes \$6,320.50 in legal fees and expenses, and \$0.00 in consultant fees and expenses. The time and resources expended and expenses incurred were necessary to conduct settlement negotiations, prepare settlement documents, and appear at Open Meetings. A summary of CARD's rate case expenses for *PUC Docket No. 47141* are appended to my affidavit as Exhibit A. Invoices for *PUC Docket No. 47141* are provided at Exhibit E.
13. ***PUC Docket No. 46449 (Application for Authority to Change Rates)***: For the period April 13, 2020 through March 31, 2021, Herrera Law & Associates, nor consultants engaged on behalf of CARD, had any billings related to *PUC Docket No. 46449* as reflected in the summary of CARD's rate case expenses for *PUC Docket No. 46449* appended to my affidavit as Exhibit A.
14. ***PUC Docket No. 40443 (Application for Authority to Change Rates)***: For the period April 13, 2020 through March 31, 2021, Herrera Law & Associates billed \$13,191.05 related to

PUC Docket No. 40443. The time and resources expended and expenses incurred were necessary to advise CARD regarding SWEPCO's appeal to the Supreme Court and preparation for and attendance at oral argument. A summary of CARD's rate case expenses for *PUC Docket No. 40443* are appended to my affidavit as Exhibit A. Invoices for *PUC Docket No. 40443* are provided at Exhibit F.

15. The attorney hourly rates of \$250-\$485 upon which the billings shown in Exhibits A and B are based, are comparable to hourly rates charged to other clients for comparable services during the same time frame and are reasonable, consistent with the rates billed to others for similar work, and comparable to rates charged by other professionals with the same level of expertise and experience.
16. The amounts charged for our services are reasonable and there has been no double billing of fees or expenses. Our firm does not charge its governmental clients for meal expenses. Also, we have not incurred or billed for luxury items, first-class airfare, limousines, alcohol, sporting events, or entertainment.
17. The hours spent to perform the tasks assigned to Herrera Law & Associates were necessary to complete the required tasks in a professional manner on a timely basis. My many years of experience in working with and supervising attorneys and consultants in proceedings at the Public Utility Commission of Texas ("Commission" or "PUC"), as well as the Railroad Commission of Texas, facilitates efforts to keep rate-case expenses reasonable.
18. Karl Nalepa holds a Bachelor of Science degree in Mineral Economics and a Master of Science degree in Petroleum Engineering, and is a certified mediator. He has been a partner in ReSolved Energy Consulting since July 2011, but joined R.J. Covington Consulting, its predecessor firm, in June 2003 as a Management Consultant. Before that he served for more than five years as an Assistant Director with the Texas Railroad Commission ("RRC"). In this position, he was responsible for overseeing the economic regulation of natural gas utilities in Texas. And prior to that, he spent five years with two different consulting firms providing advice regarding a broad range of electric and natural gas industry issues. Before that, he served four years as a Fuels Analyst with the Public Utility Commission of Texas ("PUC"). His professional career began with eight years in the reservoir engineering department of the exploration company affiliated with Transco Gas Pipeline, a major interstate pipeline company. A more complete description of Mr. Nalepa's qualifications and regulatory experience is included in his curriculum vitae in *PUC Docket No. 51415*.
19. Mr. Nalepa's time and efforts in *PUC Docket Nos. 49042, 50997 and 51415* have been coordinated by me and by attorneys working under my direction. Because of Mr. Nalepa's extensive background, experience and familiarity with SWEPCO, Mr. Nalepa has been able to work very efficiently and accomplish his assignments with fewer hours than I would expect other consultants or expert witness would require. Mr. Nalepa's and ReSolved Energy Consulting, LLC's time, effort and associated fees from January 2019 through April 12, 2019, in *Docket No. 49042* of \$14,259.00; from January 2021 through March 31, 2021, in *PUC Docket No. 50997* of \$12,321.00; and *PUC Docket No. 51415* from October 1, 2020, through March 31, 2021 of \$28,197.00 are reasonable and necessary.

20. Mr. Scott Norwood is the President of Norwood Energy Consulting, L.L.C. For over thirty years Mr. Norwood has participated in utility proceedings throughout the United States and specialized in areas of electric utility regulation, resource planning, and energy procurement. A more complete description of Mr. Norwood's qualifications and regulatory experience is included in his curriculum vitae in *PUC Docket No. 51415*. Mr. Norwood's time and efforts in *PUC Docket Nos. 51415* were coordinated by me and by attorneys working under my direction. Because of Mr. Norwood's extensive background, experience and familiarity with SWEPCO, Mr. Norwood was able to work very efficiently and accomplish his assignments with fewer hours than I would expect other consultants or expert witness would require. Mr. Norwood's time, effort and associated fees from January 2021 through March 31, 2021, in *PUC Docket No. 50997* of \$19,250.00 and in *PUC Docket No. 51415* for the period October 1, 2020 through March 31, 2021, of \$36,410.00 are reasonable and necessary.
21. David Garrett received a B.B.A. with a major in Finance, an M.B.A. and a Juris Doctor from the University of Oklahoma. He worked in private legal practice for several years before accepting a position as assistant general counsel at the Oklahoma Corporation Commission ("OCC") in 2011. At the OCC, he worked in the Office of General Counsel in regulatory proceedings. In 2012, he began working for the Public Utility Division as a regulatory analyst providing testimony in regulatory proceedings. After leaving the OCC, he formed Resolve Utility Consulting, PLLC, where he has represented various consumer groups, state agencies, and municipalities in utility regulatory proceedings, primarily in the areas of cost of capital and depreciation. He is a Certified Depreciation Professional with the Society of Depreciation Professionals. He is also a Certified Rate of Return Analyst with the Society of Utility and Regulatory Financial Analysts. A more complete description of Mr. D. Garrett's qualifications and regulatory experience is included in his curriculum vitae in *PUC Docket No. 51415*.
22. Mr. D. Garrett's time and efforts in *PUC Docket No. 51415* were coordinated by me and by attorneys working under my direction. Because of Mr. D. Garrett's extensive background, experience and familiarity with SWEPCO, Mr. D. Garrett was able to work very efficiently and accomplish his assignments with fewer hours than I would expect other consultants or expert witness would require. Mr. D. Garrett's time, effort and associated fees through March 31, 2021, in *PUC Docket No. 51415* of \$42,300.00 are reasonable and necessary.
23. Mark Garrett holds a bachelor's degree from the University of Oklahoma and completed his postgraduate hours at Stephen F. Austin State University and the University of Texas at Arlington and Pan American. Mr. M. Garrett also holds a juris doctorate degree from Oklahoma City University Law School and was admitted to the Oklahoma Bar in 1997. Mr. M. Garrett is also a Certified Public Accountant licensed in the States of Texas and Oklahoma with a background in public accounting, private industry, and utility regulation. In public accounting, as a staff auditor for a firm in Dallas, he primarily audited financial institutions in the State of Texas. In private industry, as controller for a mid-sized corporation in Dallas, Mr. M. Garrett managed the company's accounting function, including general ledger, accounts payable, financial reporting, audits, tax returns, budgets, projections, and supervision of accounting personnel. In utility regulation, he served as an auditor in the Public Utility Division of the Oklahoma Corporation Commission ("OCC")

from 1991 to 1995. In that position, he managed the audits of major gas and electric utility companies in Oklahoma.

Since leaving the OCC, he has worked on numerous rate cases and other regulatory proceedings on behalf of various consumers and consumer groups. He has provided both written and live oral testimony before public utility commissions in the states of Alaska, Arizona, Arkansas, Colorado, Massachusetts, Nevada, Oklahoma, Texas, and Utah. He has also provided written testimony in the state of Florida. His clients include large industrial customers, large gaming customers in Nevada, large hospitals and hospital groups, cities, universities, and large commercial customers. He has also testified on behalf of the commission staff in Utah and the offices of attorneys general in Oklahoma and Florida. He has also served as a presenter at the NARUC subcommittee on Accounting and Finance, on the issue of incentive compensation, and as a regular instructor at the New Mexico State University's Center for Public Utilities course on basic utility regulation. Mr. M. Garrett's resume is attached to his direct testimony in *PUC Docket No. 51415*.

24. Mr. M. Garrett's time and efforts in *PUC Docket No. 51415* were coordinated by me and by attorneys working under my direction. Because of Mr. M. Garrett's extensive background, experience and familiarity with SWEPCO, Mr. M. Garrett was able to work very efficiently and accomplish his assignments with fewer hours than I would expect other consultants or expert witness would require. Mr. M. Garrett's and Garrett Group, LLC's time, effort and associated fees through March 31, 2021, in *Docket No. 51415* of \$77,075.00 are reasonable and necessary.
25. J. Randall Woolridge, Ph.D. is the Professor of Finance and the Goldman, Sachs & Co. and Frank P. Smeal Endowed University Fellow in Business Administration at the University Park Campus of Pennsylvania State University. Dr. Woolridge is also the Director of the Smeal College Trading Room and President of the Nittany Lion Fund, LLC. Dr. Woolridge has extensive experience in evaluating market data to assist him in assessing a regulated entity's cost of capital and the effect changes in the capital markets has a utility's cost of capital. Mr. Woolridge's resume is attached to his direct testimony in *PUC Docket No. 51415*. Dr. Woolridge's time, effort and associated fees through March 31, 2021, in *PUC Docket No. 51415* of \$33,060.00 are reasonable and necessary.
26. An additional consultant engaged on CARD's behalf is Mr. Seth Schwartz with the firm of Energy Ventures Analysis ("EVA"). Mr. Schwartz is the President of EVA and leads the firm's coal practice. He has over 30 years of experience in his field of expertise in the coal industry and has worked for utilities, independent power producers, and governmental entities, including cities in Texas with regard to fuel procurement strategies and has extensive experience in acquisition and sales of coal reserves and negotiating fuel contracts. Mr. Schwartz's time, effort and associated fees from January 1, 2021 through March 31, 2021, in *PUC Docket No. 50997* of \$33,725.00 are reasonable and necessary.
27. CARD has also engaged Catherine Webking. Ms. Webking is an attorney in good standing with the State Bar of Texas and has been practicing continually since receiving her license to practice law in Texas in 1991. She graduated with a Bachelor of Science in Chemical Engineering from Texas A&M University in 1985. After working as an engineer with a

major oil and gas company for a few years, she continued her education at the University of Texas School of Law where she earned a Doctorate of Jurisprudence with honors in 1991.

In particular, Ms. Webking has extensive practice in the area of public utility law and has practiced before the Public Utility Commission of Texas and the State Office of Administrative Hearings for the entirety of her legal practice. She has been responsible for representing a variety of parties in contested cases involving electric rates, rulemakings, and other contested case proceedings.

Ms. Catherine J. Webking's time and efforts in *PUC Docket No. 51415* have been coordinated by me and by attorneys working under my direction. Ms. Webking's time, effort and associated fees from January 2021 through March 31, 2021, in *PUC Docket No. 50997* of \$6,545.00 are reasonable and necessary. The brevity of time between April 8, 2021, the date all testimony related to CARD's rate-case expenses through March 31, 2021, is due, and Ms. Webking's review of those expenses, precluded the preparation of Ms. Webking's invoices for her fees and expenses related to *PUC Docket No. 51415*; consequently, I will update my affidavit at the appropriate time to add Ms. Webking's invoices to CARD's rate-case expenses.

28. The invoices submitted by Herrera Law & Associates include a description of services performed and time expended on each activity. The City of Longview provides CARD's invoices for our firm's and consultant's services in *PUC Docket No. 51415* and the other dockets noted above to SWEPCO approximately on a monthly basis. Herrera Law & Associates has documented all charges with time sheets, invoices and records. The documentation in this case is similar to that provided in many previous cases at the Commission and is in conformance with the Commission's "rate-case-expense" rule, 16 TEXAS ADMIN. CODE § 25.245.
29. The legal expenses shown in our invoices connected with *PUC Docket Nos. 51415* and the other dockets noted above do not include luxury items. Legal expenses consist of reimbursable items such as courier services, express mail, postage and shipping, and photocopying.
30. My responsibilities, as well as other attorneys assigned to *PUC Docket No. 51415* and the other dockets noted above include client communication, strategy development, overall case management, discovery review, drafting pleadings and briefs, reviewing and editing testimony, and preparing for and attending pre-hearing conferences and hearings.
31. The other attorneys assigned to these proceedings are Mr. Brennan J. Foley, and Mr. Sergio E. Herrera.

Mr. Foley has over 12 years of related utility experience, including employment in the PUCT's Legal Division. Mr. Foley's experience at the PUCT included the gamut of cases the PUCT handles, including rate cases, CCN cases, complaints, and rulemakings.

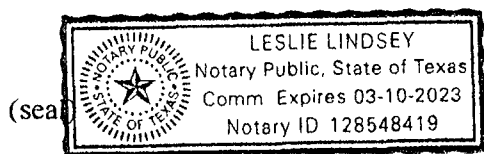
Mr. S. Herrera has been employed with our firm as a law clerk since 2015 and obtained a dual degree – JD/MBA from Texas Tech School of Law and the Rawls College of Business

in which he graduated Magna Cum Laude. Mr. S. Herrera has over five years of experience in assisting and providing support in numerous rate proceedings at the PUCT and the Railroad Commission of Texas, and "CCN" cases at the PUCT, primarily in undertaking legal research, preparing discovery and pleadings related to discovery disputes, reviewing pre-filed testimonies, preparing for cross-examination of testifying witnesses, and drafting of briefs in matters before the PUCT and the courts of appeal, attending pre-hearing conferences, and hearings on the merits of various proceedings before the PUCT and the Railroad Commission of Texas.

32. Ms. Mariann Wood is a certified paralegal having obtained her Associates of Applied Science in Paralegal Studies degree and certification from Kaplan University. Ms. Wood has over 16 years of experience as a paralegal and legal assistant, all in Administrative Law and more particularly in the public utility sector.
33. Ms. Leslie Lindsey is a certified paralegal having obtained a BA from Huston-Tillotson University and her certification from the University of Texas. Ms. Lindsey has over 10 years of experience as a paralegal and legal assistant, all in Administrative Law and all in the public utility sector.
34. Because the Public Utility Commission has not issued a final order in *PUC Docket No. 51415* I anticipate CARD will incur additional rate-case expenses. I also anticipate that CARD will incur additional rate-case expenses in the ongoing appeals of *PUC Docket Nos. 40443 and 46449*. Thus, I will supplement this affidavit with additional information as appropriate.
35. The total of CARD's actual rate case expenses through March 31, 2021 for *PUC Docket No. 51415* and the other cases noted above are \$381,126.70 including expenses from retained consultants. These amounts are reasonable given the complexity, importance and scope of this proceeding, the nature of CARD's participation, and the number of issues involved. An Excel spreadsheet summary of all rate case expenses is provided as Exhibit A.
36. On behalf of CARD, our firm reserves the right to amend this affidavit and CARD's request for reimbursement as more information is gathered over the course of *PUC Docket No. 51415* and the other cases noted above.
37. Statements in this affidavit are true and known by me personally.


Alfred R. Herrera

SWORN AND SUBSCRIBED before me on this the 8th day of April, 2021.



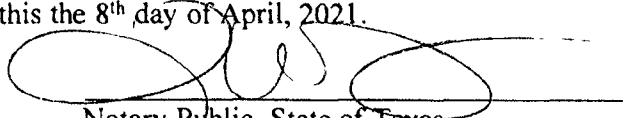

Notary Public, State of Texas

EXHIBIT A

TOTAL OF CARD'S RATE CASE EXPENSES FOR DOCKET NOS. 51415, 50997, 40443, 46449, 47141 AND 49042

Docket No.	Total
51415 (10/15/20 - 3/31/21)	\$381,126.70
50997 (1/1/21-3/31/21)	\$206,885.04
49042 (12/18/20 - 3/31/21)	\$41,462.67
47141 (4/14/20 - 3/31/21)	\$6,320.50
46449 (4/14/20 - 3/31/21)	\$0.00
40443 (4/14/20 - 3/31/21)	\$13,191.05
	\$648,985.96

EXHIBIT A

CARD's Rate Case Expense Summary for PUC Docket No. 51415

	Invoice Date	Invoice No.	Billing Period	Through Period	Hourly Fees	Expense	Invoice Amount	Total Billed to Date
Resolved Energy Consulting	11/3/2020	4683	10/1/2020	10/31/2020	\$864.00		\$864.00	
	12/2/2020	4693	11/1/2020	11/30/2020	\$3,537.00		\$3,537.00	\$4,401.00
	1/6/2021	4703	12/1/2020	12/31/2020	\$3,159.00		\$3,159.00	\$7,560.00
	2/7/2021	4728	1/1/2021	1/31/2021	\$1,881.00		\$1,881.00	\$9,441.00
	3/4/2021	4736	2/1/2021	2/28/2021	\$6,246.00		\$6,246.00	\$15,687.00
	4/6/2021	4747	3/1/2021	3/31/2021	\$12,510.00		\$12,510.00	\$28,197.00
	Resolved Energy Total							
	\$28,197.00							
Norwood Energy Consulting	11/10/2020	SWRate Oct20	10/1/2020	10/31/2020	\$5,390.00		\$5,390.00	
	12/11/2020	SWRate Nov20	11/1/2020	11/30/2020	\$5,500.00		\$5,500.00	\$10,890.00
	2/9/2021	SWRate Dec20	12/1/2020	12/31/2020	\$5,060.00		\$5,060.00	\$15,950.00
	2/28/2021	SWRate Jan21	1/1/2021	1/31/2021	\$2,860.00		\$2,860.00	\$18,810.00
	2/28/2021	SWRate Feb21	2/1/2021	2/28/2021	\$7,810.00		\$7,810.00	\$26,620.00
	4/4/2021	SWRate MAR21	3/1/2021	3/31/2021	\$9,790.00		\$9,790.00	\$36,410.00
	Norwood Energy Consulting							
	\$36,410.00							
Resolve Utility Consulting	~	INV-000354	11/1/2020	11/30/2020	\$5,450.00		\$5,450.00	
	~	INV-000378	12/1/2020	12/31/2020	\$7,450.00		\$7,450.00	\$12,900.00
	~	INV-000399	1/1/2021	1/31/2021	\$8,400.00		\$8,400.00	\$21,300.00
	~	INV-000400	2/1/2021	2/28/2021	\$9,250.00		\$9,250.00	\$30,550.00
	~	INV-000411	3/1/2021	3/31/2021	\$11,750.00		\$11,750.00	\$42,300.00
	Resolve Utility Consulting							
	\$42,300.00							
Garrett Group Consulting, Inc.	12/10/2020		11/1/2020	11/30/2020	\$6,400.00		\$6,400.00	
	1/21/2021		12/1/2020	12/31/2020	\$14,450.00		\$14,450.00	\$20,850.00
	3/15/2021		1/1/2021	2/28/2021	\$22,425.00		\$22,425.00	\$43,275.00
	4/2/2021		3/1/2021	3/31/2021	\$33,800.00		\$33,800.00	\$77,075.00
	Garrett Group Consulting							
	\$77,075.00							
J. Randall Woolridge	3/18/2021	1st Billing	10/1/2020	3/15/2021	\$28,927.50		\$28,927.50	
	3/31/2021	2nd Billing	3/15/2021	3/31/2021	\$4,132.50		\$4,132.50	\$33,060.00
	J. Randall Woolridge							
	\$33,060.00							
Scott Douglass & McConnico, LLP								
Herrera Law & Associates, PLLC	11/10/2020	10/1/2020	10/31/2020	\$37,735.50	\$40.30	\$37,775.80		
	12/11/2020	11/1/2020	11/30/2020	\$26,742.50	\$42.25	\$26,784.75		
	1/11/2021	12/1/2020	12/31/2020	\$12,932.50	\$40.95	\$12,973.45		
	2/9/2021	1/1/2021	1/31/2021	\$7,570.50	\$34.45	\$7,604.95		
	3/17/2021	2/1/2021	2/28/2021	\$29,687.50	\$99.45	\$29,786.95		
	4/6/2021	3/1/2021	3/31/2021	\$48,986.00	\$172.80	\$49,158.80		
	Herrera Law & Associates, PLLC Total							
	\$164,084.70							
Legal and Consultants	11/10/2020	10/1/2020	10/31/2020	\$37,735.50	\$6,294.30	\$44,029.80		
	12/11/2020	11/1/2020	11/30/2020	\$26,742.50	\$20,929.25	\$47,671.75		
	1/11/2021	12/1/2020	12/31/2020	\$12,932.50	\$10,649.95	\$23,582.45		
	2/9/2021	1/1/2021	1/31/2021	\$7,570.50	\$24,285.45	\$31,855.95		
	3/17/2021	2/1/2021	2/28/2021	\$29,687.50	\$83,157.95	\$112,845.45		
	4/6/2021	3/1/2021	3/31/2021	\$48,986.00	\$72,155.30	\$121,141.30		
	Legal and Consultants							
	\$381,126.70							

EXHIBIT A

CARD's Rate Case Expense Summary for PUC Docket No. 51415

							Total Legal and Consultants	\$381,126.70
							Total Billings for Services Thru 3/31/21	\$381,126.70

EXHIBIT A

CARD's Rate Case Expense Summary for Docket No. 50997

	Invoice Date	Invoice No.	Billing Period	Through Period	Hourly Fees	Expense	Invoice Amount	Total Billed to Date	
Norwood Energy Consulting	2/9/2021	SWPFuelRec Jan21	1/1/2021	1/31/2021	\$13,420.00		\$13,420.00	\$13,420.00	
	2/9/2021	SWPFuelRec Feb21	2/1/2021	2/10/2021	\$5,830.00		\$5,830.00	\$19,250.00	
							Norwood Energy Consulting		\$19,250.00
ReSolved Energy Consulting	2/4/2021	4720	1/1/2021	1/31/2021	\$9,351.00		\$9,351.00	\$9,351.00	
	2/10/2021	4730	2/1/2021	2/10/2021	\$2,970.00		\$2,970.00	\$12,321.00	
							ReSolved Energy Consulting		\$12,321.00
Energy Ventures Analysis, Inc.	2/11/2021	2021-2	1/1/2021	2/9/2021	\$33,725.00		\$33,725.00	\$33,725.00	
							Energy Ventures Analysis		\$33,725.00
Scott Douglass McConnico	1/31/2021	263001	12/1/2020	12/31/2020	\$2,200.00		\$2,200.00	\$2,200.00	
	2/28/2021	263553	1/1/2021	1/31/2021	\$4,345.00		\$4,345.00	\$6,545.00	
							Scott Douglass McConnico		\$6,545.00
Herrera Law & Associates, PLLC	2/9/2021		1/1/2021	1/31/2021	\$78,693.00	\$324.90	\$79,017.90	\$79,017.90	
	2/15/2021		2/1/2021	2/10/2021	\$38,805.00	\$1,284.64	\$40,089.64	\$119,107.54	
	3/17/2021		2/1/2021	2/28/2021	\$15,936.50	\$0.00	\$15,936.50	\$135,044.04	
							Herrera Law & Associates Total		\$135,044.04
Legal and Consultants	2/9/2021		1/1/2021	1/31/2021	\$78,693.00	\$59,020.90	\$137,713.90	\$137,713.90	
	2/15/2021		2/1/2021	2/10/2021	\$38,805.00	\$10,084.64	\$48,889.64	\$186,603.54	
	3/17/2021		2/1/2021	2/28/2021	\$15,936.50	\$4,345.00	\$20,281.50	\$206,885.04	
							Legal and Consultants		\$206,885.04
							Total Billings for Services 1/1/21 Thru 3/31/21		\$206,885.04
									\$0.00
								Total	\$206,885.04

EXHIBIT A

CARD's Rate Case Expense Summary for PUC Docket No. 49042

	Invoice Date	Invoice No.	Billing Period	Through Period	Hourly Fees	Expense	Invoice Amount	Total Billed to Date	
ReSolved Energy Consulting	2/7/2019	4335	1/1/2019	1/31/2019	\$4,323.00		\$4,323.00	\$4,323.00	
	3/6/2019	4343	2/1/2019	2/28/2019	\$3,186.00		\$3,186.00	\$7,509.00	
	4/2/2019	4364	3/1/2019	3/31/2019	\$6,426.00		\$6,426.00	\$13,935.00	
	5/2/2019	4377	4/1/2019	4/30/2019	\$324.00		\$324.00	\$14,259.00	
								Consultant	\$14,259.00
Herrera Law & Associates, PLLC	1/9/2019		12/1/2018	12/31/2018	\$999.00	\$0.00	\$999.00	\$999.00	
	2/7/2019		1/1/2019	1/31/2019	\$4,053.00	\$124.90	\$4,177.90	\$5,176.90	
	3/8/2019		2/1/2019	2/29/19	\$5,377.50	\$28.10	\$5,405.60	\$10,582.50	
	4/3/2019		3/1/2019	3/31/2019	\$12,124.00	\$1,370.57	\$13,494.57	\$24,077.07	
	5/6/2019		4/1/2019	4/30/2019	\$1,649.00	\$36.10	\$1,685.10	\$25,762.17	
	6/6/2019		5/1/2019	5/31/2019	\$409.00	\$0.00	\$409.00	\$26,171.17	
	8/7/2019		6/1/2019	7/31/2019	\$1,032.50	\$0.00	\$1,032.50	\$27,203.67	
								Herrera Law & Associates, PLLC Total	\$27,203.67
Legal and Consultants	1/9/2019		12/1/2018	12/31/2018	\$999.00	\$0.00	\$999.00	\$999.00	
	2/7/2019		1/1/2019	1/31/2019	\$4,053.00	\$4,447.90	\$8,500.90	\$9,499.90	
	3/8/2019		2/1/2019	2/29/19	\$5,377.50	\$3,214.10	\$8,591.60	\$18,091.50	
	4/3/2019		3/1/2019	3/31/2019	\$12,124.00	\$7,796.57	\$19,920.57	\$38,012.07	
	5/6/2019		4/1/2019	4/30/2019	\$1,649.00	\$360.10	\$2,009.10	\$40,021.17	
	6/6/2019		5/1/2019	5/31/2019	\$409.00	\$0.00	\$409.00	\$40,430.17	
	8/7/2019		6/1/2019	7/31/2019	\$1,032.50	\$0.00	\$1,032.50	\$41,462.67	
								Legal and Consultants	\$41,462.67
								Total Legal and Consultants	\$41,462.67
								Total Billings for Services 12/18/20 Thru 3/31/21	\$41,462.67

EXHIBIT A

CARD's Rate Case Expense Summary for PUC Docket No. 47141

	Invoice Date	Invoice No.	Billing Period	Through Period	Hourly Fees	Expense	Invoice Amount	Total Billed to Date	
Consultant								\$0.00	
								Consultant	\$0.00
Herrera Law & Associates, PLLC	5/13/2020		4/13/2020	4/30/2020	\$1,656.50		\$1,656.50	\$1,656.50	
	6/9/2020		5/1/2020	5/31/2020	\$3,273.50		\$3,273.50	\$4,930.00	
	7/20/2020		6/1/2020	6/30/2020	\$834.00		\$834.00	\$5,764.00	
	9/7/2020		7/1/2020	8/31/2020	\$556.50		\$556.50	\$6,320.50	
							Herrera Law & Associates, PLLC Total		\$6,320.50
Legal and Consultants	5/13/2020		4/13/2020	4/30/2020	\$1,656.50		\$1,656.50	\$1,656.50	
	6/9/2020		5/1/2020	5/31/2020	\$3,273.50		\$3,273.50	\$4,930.00	
	7/20/2020		6/1/2020	6/30/2020	\$834.00		\$834.00	\$5,764.00	
	9/7/2020		7/1/2020	8/31/2020	\$556.50		\$556.50	\$6,320.50	
							Legal and Consultants		\$6,320.50
							Total Legal and Consultants		\$6,320.50
							Total Billings for Services 4/14/20 Thru 3/31/21		\$6,320.50

EXHIBIT A

CARD's Rate Case Expense Summary for PUC Docket No. 46449

	Invoice Date	Invoice No.	Billing Period	Through Period	Hourly Fees	Expense	Invoice Amount	Total Billed to Date	
Consultant								\$0.00	
								Consultant	\$0.00
Herrera Law & Associates, PLLC								\$0.00	
							Herrera Law & Associates, PLLC Total		\$0.00
Legal and Consultants								\$0.00	
								Legal and Consultants	\$0.00
							Total Legal and Consultants		\$0.00
							Total Billings for Services 4/14/20 Thru 3/31/21		\$0.00

EXHIBIT A

CARD's Rate Case Expense Summary for PUC Docket No. 40443

	Invoice Date	Invoice No.	Billing Period	Through Period	Hourly Fees	Expense	Invoice Amount	Total Billed to Date	
Consultant								\$0.00	
								Consultant	\$0.00
Herrera Law & Associates, PLLC	11/10/2020		10/1/2020	10/31/2020	\$3,196.00	\$195.00	\$3,391.00	\$3,391.00	
	12/8/2020		11/1/2020	11/31/20	\$3,992.50	\$1.95	\$3,994.45	\$7,385.45	
	1/11/2021		12/1/2020	12/31/2020	\$4,813.50	\$152.10	\$4,965.60	\$12,351.05	
	4/7/2021		3/1/2021	3/31/2021	\$840.00	\$0.00	\$840.00	\$13,191.05	
							Herrera Law & Associates, PLLC Total		\$13,191.05
Legal and Consultants	11/10/2020		10/1/2020	10/31/2020	\$3,196.00	\$195.00	\$3,391.00	\$3,391.00	
	12/8/2020		11/1/2020	11/31/20	\$3,992.50	\$1.95	\$3,994.45	\$7,385.45	
	1/11/2021		12/1/2020	12/31/2020	\$4,813.50	\$152.10	\$4,965.60	\$12,351.05	
	4/7/2021		3/1/2021	3/31/2021	\$840.00	\$0.00	\$840.00	\$13,191.05	
							Legal and Consultants		\$13,191.05
							Total Legal and Consultants		\$13,191.05
							Total Billings for Services 4/14/20 Thru 3/31/21		\$13,191.05



HERRERA LAW
& ASSOCIATES, PLLC

November 11, 2020

Cities Advocating Reasonable Deregulation
c/o Jim Finley
City of Longview
P.O. Box 1952
Longview, Texas 75606-1952

**Re: PUC Docket No. 51415; *Application of Southwestern Electric Power Company for Authority to Change Rates*
Account # 806**

Dear Jim:

Enclosed is our invoice for services provided to the Cities Advocating Reasonable Deregulation regarding the above referenced matter through October, 2020.

Please forward a copy of this invoice to the company.

If I can provide any further explanation about the services provided for you, please call me at (512) 474-1492.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alfred R. Herrera'.

Alfred R. Herrera

ARH:ll
Enclosure

Herrera Law & Associates, PLLC
4400 Medical Parkway
Austin, TX 78756
512-474-1492

November 10, 2020

Invoice submitted to:

Cities Advocating Reasonable Deregulation

c/o Jim Finley

City of Longview

P.O. Box 1952

Longview, TX 75606-1952

In Reference To:

*Application of Southwestern
Electric Power Company for
Authority to Change Rates
PUC DN 51415
Acct #806*

STATEMENT FOR PROFESSIONAL SERVICES

Legal Fees:

		<u>Hrs/Rate</u>	<u>Amount</u>
10/15/20	Alfred R. Herrera - Preliminary overview of SWEPCO Rate Filing Package	6.60 485.00/hr	3,201.00
	Brennan Foley - Review application, direct testimony and supporting schedules and conduct relevant research re: case overview	2.20 350.00/hr	770.00
	Sergio E. Herrera - Began review of SWEPCO Application	2.90 250.00/hr	725.00
10/16/20	Alfred R. Herrera - Continue overview of SWEPCO Rate Filing Package	3.60 485.00/hr	1,746.00

Cities Advocating Reasonable Deregulation

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
10/16/20	Alfred R. Herrera - Various communications with parties and prepare summary of proposed settlement re: SPS's withdrawal of application	1.60 485.00/hr	776.00
	Brennan Foley - Draft suspension resolution and AIS including calculations of average bill impact of proposed rate increase	4.00 350.00/hr	1,400.00
10/18/20	Alfred R. Herrera - Prepare memorandum and draft suspension resolutions re: SWEPCO rate filing package	5.30 485.00/hr	2,570.50
	Brennan Foley - Draft suspension resolution and AIS including calculations of average bill impact of proposed rate increase and correspond with A. Herrera re: same	5.50 350.00/hr	1,925.00
10/19/20	Alfred R. Herrera - Prepare for and attend meeting with CARD Steering Committee	1.50 485.00/hr	727.50
	Alfred R. Herrera -Prepare memo to all CARD cities re: prior increases in rates and action needed on pending rate case	3.60 485.00/hr	1,746.00
	Brennan Foley - Conduct research re: SWEPCO prior rate case revenue increases	1.10 350.00/hr	385.00
	Sergio E. Herrera - Reviewed and edited CARD AIS/Resolution	0.50 250.00/hr	125.00
10/20/20	Alfred R. Herrera -Continue overview of SWEPCO Rate Filing Package	2.10 485.00/hr	1,018.50
	Brennan Foley - Review application, direct testimony and supporting schedules re: accounting (1.0) and generation issues (1.5)	2.50 350.00/hr	875.00
10/21/20	Alfred R. Herrera -Continue overview of SWEPCO Rate Filing Package	2.80 485.00/hr	1,358.00
10/22/20	Leslie Lindsey - Prepare and format CARD's 1st set of RFIs to SWEPCO	0.90 145.00/hr	130.50

Cities Advocating Reasonable Deregulation

Page 3

		<u>Hrs/Rate</u>	<u>Amount</u>
10/22/20	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's Motion to Intervene	0.40 145.00/hr	58.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Prepared Protective Order Certifications	0.50 145.00/hr	72.50
	Alfred R. Herrera -Continue overview of SWEPCO Rate Filing Package	3.10 485.00/hr	1,503.50
	Alfred R. Herrera -Various communications w/CARD Cities re: questions raised by SWEPCO's conference call with CARD Cities	1.80 485.00/hr	873.00
	Brennan Foley - Review application, direct testimony and supporting schedules and conduct relevant research re: rate of return (2.0), system reliability and vegetation management issues (0.3)	2.30 350.00/hr	805.00
	Sergio E. Herrera - Drafted CARD MTI	0.60 250.00/hr	150.00
	Sergio E. Herrera - Continued review of SWEPCO RC application	1.80 250.00/hr	450.00
10/23/20	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's 1st set of RFIs to SWEPCO	0.50 145.00/hr	72.50
	Alfred R. Herrera - Various communications w/CARD Cities re: questions raised by SWEPCO's conference call with CARD Cities	0.90 485.00/hr	436.50
	Alfred R. Herrera - Continue review of SWEPCO Rate Filing Package	3.80 485.00/hr	1,843.00
	Brennan Foley - Review RFIs re: generation and vegetation management	0.60 350.00/hr	210.00
	Sergio E. Herrera - Reviewed S. Norwood RFI Set 1	0.50 250.00/hr	125.00

Cities Advocating Reasonable Deregulation

Page 4

		<u>Hrs/Rate</u>	<u>Amount</u>
10/24/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.80 145.00/hr	261.00
10/26/20	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's 2nd set of RFIs to SWEPCO	0.50 145.00/hr	72.50
	Alfred R. Herrera - Continue review of SWEPCO Rate Filing Package	2.70 485.00/hr	1,309.50
	Brennan Foley - Review application, direct testimony and supporting schedules and conduct relevant research re: system reliability and vegetation management issues (1.2), transmission and distribution issues (1.0), depreciation (1.0)	3.20 350.00/hr	1,120.00
	Sergio E. Herrera - Reviewed and edited CARD RFI No. 2	0.60 250.00/hr	150.00
	Sergio E. Herrera - Communicated with SWEPCO Counsel RE: RFI Clarification	0.40 250.00/hr	100.00
	Sergio E. Herrera - Communicated with CARD consultant RE: RFI clarification	0.80 250.00/hr	200.00
10/27/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.70 145.00/hr	101.50
	Alfred R. Herrera - Continue review of SWEPCO Rate Filing Package	3.10 485.00/hr	1,503.50
	Alfred R. Herrera - Various communications with CARD cities re: next steps/actions following SWEPCO's presentation to cities re: rate case	1.20 485.00/hr	582.00
	Sergio E. Herrera - Communicated with SWEPCO Counsel RE: RFI Dispute	0.30 250.00/hr	75.00
10/28/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.50 145.00/hr	72.50

Cities Advocating Reasonable Deregulation

Page 5

		<u>Hrs/Rate</u>	<u>Amount</u>
10/28/20	Alfred R. Herrera - Review McMahon's testimony re: Generation O&M and related potential discovery dispute re: plans for environmental compliance	1.60 485.00/hr	776.00
	Alfred R. Herrera - Various communications with CARD cities re: next steps/actions following SWEPCO's presentation to cities re: rate case	0.80 485.00/hr	388.00
	Brennan Foley - Review application, direct testimony and supporting schedules and conduct relevant research re: tax issues (0.7); affiliates issues (0.7)	1.40 350.00/hr	490.00
	Sergio E. Herrera - Continued review of SWEPCO RC Application filing package	2.60 250.00/hr	650.00
	Sergio E. Herrera - Communicated with SWEPCO Counsel RE: CARD No. 1-13	0.60 250.00/hr	150.00
	Sergio E. Herrera - Communicated with S. Norwood RE: CARD 1-13	0.70 250.00/hr	175.00
	Sergio E. Herrera - Zoom call with ARH RE: SWEPCO dispute over CARD 1-13	1.00 250.00/hr	250.00
10/29/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.40 145.00/hr	58.00
	Alfred R. Herrera - Prepare and review and revise discovery requests re: cost of capital	1.20 485.00/hr	582.00
	Alfred R. Herrera - Discovery issue: review/assess validity of SWEPCO's potential objection to CARD RFI 1-13 re: planned enviro projects	1.00 485.00/hr	485.00
	Brennan Foley - Prepare RFIs re: rate of return	0.60 350.00/hr	210.00

Cities Advocating Reasonable Deregulation

Page 6

		<u>Hrs/Rate</u>	<u>Amount</u>
10/29/20	Brennan Foley - Review application, direct testimony and supporting schedules and conduct relevant research re: payroll and incentive compensation	1.70 350.00/hr	595.00
	Sergio E. Herrera - Communicated with ARH & S. Norwood RE: SWEPCO's cont'd issue with CARD 1-13	0.50 250.00/hr	125.00
	Sergio E. Herrera - Reviewed McMahon direct testimony RE: SWEPCO issue with CARD 1-13	1.10 250.00/hr	275.00
	Sergio E. Herrera - Communicated with SWEPCO Counsel RE: CARD 1-13	0.70 250.00/hr	175.00
10/30/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.40 145.00/hr	58.00
	Brennan Foley - Review application, direct testimony and supporting schedules and conduct relevant research re: SPP and generation issues	1.60 350.00/hr	560.00
	Sergio E. Herrera - Communicated with SWEPCO Counsel RE pending objection to CARD 1-13	0.20 250.00/hr	50.00
10/31/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.40 145.00/hr	58.00
Total Legal Fees:		97.80	\$37,735.50
Expenses :			
10/01/20	Research on Westlaw for the month of October 2020		40.30
	Consultant Invoice - ReSolved Energy Consulting Inv #4683		864.00
	Consultant Invoice - Norwood Energy Consulting, LLC Inv #SWPRate Oct20		5,390.00
Total expenses:			\$6,294.30

Cities Advocating Reasonable Deregulation

Page 7

Amount

TOTAL AMOUNT OF THIS BILL:

\$44,029.80

BALANCE DUE

\$44,029.80

WESTLAW Research

October 2020

Account #	Research Time	X \$65.00/hr.	+ Excluded Charges	Total
		X \$65.00		
		X \$65.00		
		X \$65.00		
		X \$65.00		
806	0.62	X \$65.00		\$40.30

ReSolved Energy Consulting, LLC

11044 Research Blvd, A-420

Austin, TX 78759

Invoice

DATE	INVOICE NUMBER
11/3/2020	4683

BILL TO

Herrera Law & Associates, PLLC

Alfred Herrera

4400 Medical Parkway

Austin, Texas 78756

PROJECT			
HL SWEPCO RC 51415			
DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	3.2	270.00	864.00
Work Completed thru - October 31, 2020		TOTAL DUE	\$864.00

Monthly Recap

Karl Nalepa

Date	Task	Hours
October 16, 2020	Download rate filing application.	0.50
October 19, 2020	Review application.	1.20
October 20, 2020	Review application.	1.50
		3.20

Norwood Energy Consulting, L.L.C.

P. O. Box 30197
Austin, Texas 78755-3197
scott@scottnorwood.com
(512) 297-1889

Mr. Alfred R. Herrera
Herrera Law & Associates, PLLC
4400 Medical Parkway
Austin, Texas 78756

Date: 11-10-20
Tax ID #: 26-2374359
Invoice #: SWPRate OCT20

Re: SWEPCO Base Rate Case Analysis - PUC Docket No. 51415

(Signature) ✓

Statement for professional services rendered 10-1-20 through 10-31-20 ✓

10-22-20	Reviewed SWEPCO testimony; worked on RFIs	7.0 hrs
10-23-20	Reviewed SWEPCO testimony and prior orders; drafted RFIs	6.5 hrs
10-28-20	Reviewed SWEPCO testimony on Dolet Hills issues	5.0 hrs
10-29-20	Reviewed SWEPCO testimony on plant operations and expenses	<u>6.0 hrs</u>

Total hours: 24.5 hrs

Total due: 24.5 hours at \$220 per hour = \$5,390 ✓

Thank you for the opportunity to assist with this project.



December 8, 2020

Cities Advocating Reasonable Deregulation
c/o Jim Finley
City of Longview
P.O. Box 1952
Longview, Texas 75606-1952

**Re: PUC Docket No. 51415; *Application of Southwestern Electric Power Company for Authority to Change Rates*
Account # 806**

Dear Jim:

Enclosed is our invoice for services provided to the Cities Advocating Reasonable Deregulation regarding the above referenced matter through November, 2020.

Please forward a copy of this invoice to the company.

If I can provide any further explanation about the services provided for you, please call me at (512) 474-1492.

Sincerely,

Alfred R. Herrera

ARH:ll
Enclosure

Herrera Law & Associates, PLLC
4400 Medical Parkway
Austin, TX 78756
512-474-1492

December 11, 2020

Invoice submitted to:

Cities Advocating Reasonable Deregulation

c/o Jim Finley

City of Longview

P.O. Box 1952

Longview, TX 75606-1952

In Reference To:

*Application of Southwestern
Electric Power Company for
Authority to Change Rates
PUC DN 51415
Acct #806*

STATEMENT FOR PROFESSIONAL SERVICES

Legal Fees:

		<u>Hrs/Rate</u>	<u>Amount</u>
11/02/20	Brennan Foley - Review and assess SWEPCO's objections to CARD RFI 1-13 re: environmental compliance costs	0.30 350.00/hr	105.00
	Brennan Foley - Review OPUC RFIs	0.10 350.00/hr	35.00
11/04/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.60 145.00/hr	87.00
	Sergio E. Herrera - Reviewed SWEPCO's application RE compliance issues	1.10 250.00/hr	275.00

Cities Advocating Reasonable Deregulation

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
11/04/20	Sergio E. Herrera - Drafted Motion to Compel RE CARD 1-13	3.80 250.00/hr	950.00
11/05/20	Alfred R. Herrera - Various communications w/CARD cities re: suspension resolution	1.80 485.00/hr	873.00
	Alfred R. Herrera - Review ROR/ROE testimony & ID areas/issues for discovery	2.80 485.00/hr	1,358.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.20 145.00/hr	29.00
	Sergio E. Herrera - Continued drafting MTC RE CARD 1-13	2.70 250.00/hr	675.00
11/06/20	Alfred R. Herrera - Continue review ROR/ROE testimony & ID areas/issues for discovery	2.30 485.00/hr	1,115.50
	Alfred R. Herrera - Various communications w/CARD cities re: resolution to intervene for non-orig. jurisdiction cities	1.20 485.00/hr	582.00
	Brennan Foley - Review/revise motion to compel response to RFI 1-13	0.80 350.00/hr	280.00
	Brennan Foley - Review application, direct testimony and supporting schedules and conduct relevant research re: self-insurance (0.6) and rate design (1.0)	1.60 350.00/hr	560.00
	Sergio E. Herrera - Reviewed and edited MTC RE CARD 1-13	1.00 250.00/hr	250.00
11/07/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.10 145.00/hr	159.50
11/09/20	Brennan Foley - Review and revise proposed procedural schedule	0.80 350.00/hr	280.00

Cities Advocating Reasonable Deregulation

Page 3

		<u>Hrs/Rate</u>	<u>Amount</u>
11/09/20	Leslie Lindsey - Prepare, format, file and serve on all parties Motion to Compel response CARD RFI 1-13 to SWEPCO	0.50 145.00/hr	72.50
	Sergio E. Herrera - Finalized edits RE MTC before filing	0.30 250.00/hr	75.00
	Sergio E. Herrera - Reviewed SWEPCO application RE pending list of issues	1.80 250.00/hr	450.00
11/10/20	Brennan Foley - Draft list of issues	1.90 350.00/hr	665.00
	Brennan Foley - Review SWEPCO's amended notice and Staff recommendation on notice	0.30 350.00/hr	105.00
	Brennan Foley - Review responses to TIEC RFIs re: generation	0.20 350.00/hr	70.00
	Brennan Foley - Review OPUC RFIs re: incentive compensation and affiliates costs	0.20 350.00/hr	70.00
	Brennan Foley - Review cost of capital schedules and correspond with E. D'Ambrosio and R. Woolridge re: schedule errors	0.40 350.00/hr	140.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.50 145.00/hr	72.50
	Sergio E. Herrera - Reviewed TIEC's Proposed procedural schedule	0.80 250.00/hr	200.00
11/11/20	Alfred R. Herrera - Review and revise CARD's list of issues	0.80 485.00/hr	388.00
	Brennan Foley - Review parties' edits to proposed procedural schedule and correspond with A. Herrera and S. Herrera re: same	0.20 350.00/hr	70.00
	Brennan Foley - Review cost of capital schedules and correspond with R. Woolridge re: errors in schedules	1.00 350.00/hr	350.00

Cities Advocating Reasonable Deregulation

Page 4

		<u>Hrs/Rate</u>	<u>Amount</u>
11/11/20	Brennan Foley - Revise list of issues	0.40 350.00/hr	140.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.10 145.00/hr	14.50
	Sergio E. Herrera - Communicated with SWEPCO Counsel RE CARD RFI 1-21	0.30 250.00/hr	75.00
	Sergio E. Herrera - Reviewed CARD RFIs and Communicated w/ S. Norwood RE Clarification	0.90 250.00/hr	225.00
	Sergio E. Herrera - Drafted comparison of CARD's proposed schedule w/ TIEC and SWEPCOs	1.30 250.00/hr	325.00
11/12/20	Brennan Foley - Review cost of capital schedules and correspond with R. Woolridge re: errors in schedules	0.20 350.00/hr	70.00
	Brennan Foley - Review Sierra Club, TIEC and OPUC RFIs re: generation (0.2) and taxes (0.1)	0.30 350.00/hr	105.00
	Brennan Foley - Review parties' edits to proposed procedural schedule	0.20 350.00/hr	70.00
	Brennan Foley - Review objections to TIEC RFIs	0.20 350.00/hr	70.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.80 145.00/hr	116.00
	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's List of Issues; Emails with L.Hogrewe regarding Confidential RFIs from Sierra Club	0.50 145.00/hr	72.50
	Leslie Lindsey - Prepare additional protective order certs for filing	0.20 145.00/hr	29.00

Cities Advocating Reasonable Deregulation

Page 5

		<u>Hrs/Rate</u>	<u>Amount</u>
11/12/20	Sergio E. Herrera - Reviewed SWEPCO's List of Issues	0.50 250.00/hr	125.00
	Sergio E. Herrera - Communicated with SWEPCO Counsel RE CARD RFIs	0.30 250.00/hr	75.00
	Sergio E. Herrera - Drafted notes RE: SWEPCO RFI Question	0.90 250.00/hr	225.00
	Sergio E. Herrera - Communicated with ARH RE SWEPCO's question	0.50 250.00/hr	125.00
	Sergio E. Herrera - Communicated with Intervenor's RE Procedural Schedule	0.30 250.00/hr	75.00
	Sergio E. Herrera - Reviewed Staff's proposed edits to procedural schedule	0.60 250.00/hr	150.00
	Sergio E. Herrera - Communicated with Intervenor's RE Procedural Schedule reflecting Staff's edits	0.30 250.00/hr	75.00
11/13/20	Alfred R. Herrera - Prepare for and attend PHC	2.60 485.00/hr	1,261.00
	Brennan Foley - Review parties' lists of issues	0.40 350.00/hr	140.00
	Brennan Foley - Review responses to CARD RFIs re: generation	1.00 350.00/hr	350.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.40 145.00/hr	58.00
	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's Protective Order Certifications	0.40 145.00/hr	58.00
	Sergio E. Herrera - Prepared for PHC via Zoom	0.80 250.00/hr	200.00

Cities Advocating Reasonable Deregulation

Page 6

		<u>Hrs/Rate</u>	<u>Amount</u>
11/13/20	Sergio E. Herrera - Attended PHC via Zoom	0.60 250.00/hr	150.00
	Sergio E. Herrera - Communicated with ARH RE PHC	0.40 250.00/hr	100.00
	Sergio E. Herrera - Held zoom call with Intervenors RE PHC and Schedule	0.50 250.00/hr	125.00
	Sergio E. Herrera - Reviewed finalized proposed intervenor schedule	0.20 250.00/hr	50.00
11/14/20	Mariann Wood - Reviewed and updated case file; Download HS/CONF Application and RFI Responses; Updated discovery spreadsheet	1.50 145.00/hr	217.50
11/16/20	Brennan Foley - Review responses to RFIs re: generation (0.3), RCEs (0.1), cost allocation and rate design (0.2), and storm reserve (0.1)	0.70 350.00/hr	245.00
	Leslie Lindsey - Prepare format, file and serve on all parties CARD's additional Protective Order Certifications	0.30 145.00/hr	43.50
	Sergio E. Herrera - Reviewed revised intervenor schedule reflecting SWEPCO edits	0.40 250.00/hr	100.00
11/17/20	Brennan Foley - Review parties' proposed changes to procedural schedule	0.20 350.00/hr	70.00
	Brennan Foley - Review responses to RFIs re: generation (0.7); transmission and distribution assets (0.2) and vegetation management (0.5)	1.40 350.00/hr	490.00
	Brennan Foley - Review and assess SWEPCO's response to CARD's motion to compel response to CARD RFI 1-13	0.20 350.00/hr	70.00
	Mariann Wood - Reviewed and updated case file; Updated discovery spreadsheet	1.90 145.00/hr	275.50

Cities Advocating Reasonable Deregulation

Page 7

		<u>Hrs/Rate</u>	<u>Amount</u>
11/17/20	Sergio E. Herrera - Reviewed SWEPCO's response to intervenor proposed schedule	0.30 250.00/hr	75.00
	Sergio E. Herrera - Reviewed updated agreed to schedule	0.40 250.00/hr	100.00
11/18/20	Alfred R. Herrera - Review RFI responses - various topics	3.20 485.00/hr	1,552.00
	Alfred R. Herrera - Review RFI responses - various topics	4.10 485.00/hr	1,988.50
	Brennan Foley - Review application, direct testimony and supporting schedules and conduct relevant research re: taxes (1.5) and affiliates expenses (1.5)	3.00 350.00/hr	1,050.00
	Sergio E. Herrera - Reviewed updated agreed to schedule and agreed to motion	0.40 250.00/hr	100.00
11/19/20	Mariann Wood - Reviewed and updated case file	0.40 145.00/hr	58.00
	Leslie Lindsey - Formatted CARD 4th Set of RFIs sent to attorneys for editing	0.30 145.00/hr	43.50
	Sergio E. Herrera - Reviewed SWEPCO's application/testimony RE CA/RD	3.10 250.00/hr	775.00
11/20/20	Brennan Foley - Prepare RFIs re: accounting issues and	0.50 350.00/hr	175.00
	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's 4th Set of RFIs to SWEPCO	0.30 145.00/hr	43.50
11/22/20	Mariann Wood - Reviewed and updated case file	0.10 145.00/hr	14.50

Cities Advocating Reasonable Deregulation

Page 8

		<u>Hrs/Rate</u>	<u>Amount</u>
11/23/20	Brennan Foley - Review application, direct testimony and supporting schedules and conduct relevant research re: incentive compensation	1.50 350.00/hr	525.00
11/24/20	Brennan Foley - Review application, direct testimony and supporting schedules and conduct relevant research re: affiliates (0.8); generation (0.5); self-insurance (0.8); and cost allocation and rate design (1.0)	3.10 350.00/hr	1,085.00
	Brennan Foley - Review OPUC and Staff RFIs re: incentive compensation (0.1) and self-insurance (0.1) and cost of capital (0.1)	0.30 350.00/hr	105.00
	Brennan Foley - Review responses to RFIs re: incentive compensation (0.2) and generation (0.2)	0.40 350.00/hr	140.00
	Brennan Foley - Review SWEPCO's supplemental RCE report	0.20 350.00/hr	70.00
	Mariann Wood - Reviewed and updated case file; Updated discovery spreadsheet	0.60 145.00/hr	87.00
11/25/20	Mariann Wood - Reviewed and updated case file	0.30 145.00/hr	43.50
11/29/20	Mariann Wood - Reviewed and updated case file Updated discovery spreadsheet	3.50 145.00/hr	507.50
11/30/20	Alfred R. Herrera - Review prior PUCT rulings re: battery storage re: rate treatment	3.20 485.00/hr	1,552.00
	Mariann Wood - Reviewed and updated case file Updated discovery spreadsheet	1.00 145.00/hr	145.00
Total Legal Fees:		84.00	\$26,742.50

Cities Advocating Reasonable Deregulation

Page 9

Expenses :

	<u>Amount</u>
11/01/20 Research on Westlaw for the month of November 2020	42.25
Consultant Invoice - ReSolved Energy Consulting, LLC Inv #4693	3,537.00
Consultant Invoice - Garrett Group Consulting, Inc.	6,400.00
Consultant Invoice - Norwood Energy Consulting, LLC Inv #SWPRate Nov 20	5,500.00
Consultant Invoice - Resolve Utility Consulting Inv #000354	5,450.00
Total expenses:	<u>\$20,929.25</u>
TOTAL AMOUNT OF THIS BILL:	<u>\$47,671.75</u>
Previous balance	<u>\$44,029.80</u>
BALANCE DUE	<u><u>\$91,701.55</u></u>

WESTLAW Research

November 2020

Account #	Research Time	X \$65.00/hr.	+ Excluded Charges	Total
████	████	X \$65.00		████
████	████	X \$65.00		████
████	████	X \$65.00		████
806	0.65	X \$65.00		\$42.25

ReSolved Energy Consulting, LLC

11044 Research Blvd, A-420

Austin, TX 78759

Invoice

DATE	INVOICE NUMBER
12/2/2020	4693

BILL TO

Herrera Law & Associates, PLLC

Alfred Herrera

4400 Medical Parkway

Austin, Texas 78756

**PROJECT**

HL SWEPCO RC 51415

DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	13.1	270.00	3,537.00
Work Completed thru - November 30, 2020		TOTAL DUE	\$3,537.00

Monthly Recap

Karl Nalepa

Date	Task	Hours
November 2, 2020	Review filing.	1.80
November 3, 2020	Continue to review filing.	1.30
November 5, 2020	Review filing	0.50
November 6, 2020	Review discovery.	0.20
November 9, 2020	Review schedules.	0.80
November 11, 2020	Review draft preliminary issues and send edits to B. Foley.	0.70
November 13, 2020	Review responses to discovery.	0.80
November 16, 2020	Review responses to discovery.	0.80
November 18, 2020	Review schedules. Work on analysis.	1.20
November 19, 2020	Review responses to discovery.	0.80
November 23, 2020	Work on analysis and discovery.	1.00
November 24, 2020	Work on analysis and discovery.	0.80
November 25, 2020	Review responses to discovery.	0.70
November 30, 2020	Review responses to discovery. Work on analysis.	1.70
		13.10

GARRETT GROUP CONSULTING, INC.
4028 OAKDALE FARM CIRCLE
EDMOND, OK 73013

TELEPHONE (405) 239-2226

E-MAIL MGARRETT@GARRETTGROUPLLC.COM

December 10, 2020

Alfred R. Herrera
Herrera Law & Associates, PLLC
816 Congress Avenue, Suite 950
Austin, Texas 78701



RE: SWEPCO 2020 Rate Case; Docket No. PUC 51415

Dear Freddy:

Our invoice for professional services in November 2020 in connection with the above-referenced case follows:

I. Professional Services:		
A.	Mark Garrett JD, CPA – 18 hours at \$250.00 per hour (Details in Attachment A)	\$4,500.00
B.	Ed Farrar CPA – 6 hours at \$150.00 per hour (Details in Attachment B)	\$900.00
C.	Garry Garrett – 8 hours at \$125.00 per hour (Details in Attachment C)	\$1,000.00
II. Expenses:		
	Office Expenses	<u>N/C</u>
III. Total This Invoice:		\$6,400.00

We appreciate the opportunity to work with you on this case. Please call me if you have any questions.

Sincerely,



Mark E. Garrett

MEG/gg

Attachments

Attachment A

Consulting Tasks for *SWEPCO 2020 Rate Case*
Docket No. PUC 51415

(Mark Garrett)

November 2020 – 18 Hours

Date	Task	Hours
19	Review filing; work on discovery; work with other consultants.	6
24	Review filing; work on discovery; work with other consultants.	4
28	Review filing; work on discovery; work with other consultants.	4
29	Review filing; work on discovery; work with other consultants.	4
Total		18

Attachment B

Consulting Tasks for SWEPCO 2020 Rate Case
Docket No. PUC 51415

(Edwin Farrar)

November 2020 – 6 Hours

Date	Task	Hours
18	Review application	1
19	Review application, testimony, and exhibits, draft discovery questions	5
Total		6

Attachment C**Consulting Tasks for SWEPCO 2020 Rate Case***Docket No. PUC 51415**(Garry Garrett)***November 2020 – 8 Hours**

Date	Task	Hours
17	Initial case review and analysis	2
18	Develop issues, develop discovery	4
19	Develop issues, develop discovery	2
Total		8

Norwood Energy Consulting, L.L.C.

P. O. Box 30197
Austin, Texas 78755-3197
scott@scottnorwood.com
(512) 297-1889

Mr. Alfred R. Herrera
Herrera Law & Associates, PLLC
4400 Medical Parkway
Austin, Texas 78756

Date: 12-11-20
Tax ID #: 26-2374359
Invoice#: SWPRate NOV20

Re: SWEPCO Base Rate Case Analysis - PUC Docket No. 51415



Statement for professional services rendered 11-1-20 through 11-30-20

11-02-20	Reviewed Dolet Hills retirement issues and RFI responses	5.0 hrs
11-04-20	Reviewed issues on allocation of Turk merchant costs	4.5 hrs
11-17-20	Reviewed SWEPCO coal inventory levels; reviewed RFIs	4.0 hrs
11-20-20	Reviewed SWEPCO RFI responses; reviewed economic viability data and plant operating costs	5.0 hrs
11-24-20	Reviewed plant operating costs; reviewed RFIs; reviewed SWEPCO purchased capacity issues	<u>6.5 hrs</u>
Total hours:		25.0 hrs

Total due: 25.0 hours at \$220 per hour = \$5,500

Thank you for the opportunity to assist with this project.

**Resolve Utility Consulting PLLC**

101 Park Avenue

Suite 1125

Oklahoma City, Oklahoma 73102

(405) 249-1050

INVOICE

Bill To**Herrera Law & Associates, PLLC**

4400 Medical Parkway

Austin, TX 78701

Invoice#

INV-000354

Project Name

SWEPCO 51415

A handwritten signature, possibly 'S06', enclosed in an oval.

Task & Date	Hours	Rate	Amount
Review application, testimony, exhibits and workpapers 11/02/20	3.75	200.00	750.00
Review application, testimony, exhibits and workpapers 11/05/20	2.50	200.00	500.00
Review application, testimony, exhibits and workpapers 11/10/20	3.00	200.00	600.00
Review application, testimony, exhibits and workpapers 11/12/20	3.75	200.00	750.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 11/16/20	3.25	200.00	650.00
Review application, testimony, exhibits and workpapers 11/18/20	3.00	200.00	600.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 11/20/20	3.00	200.00	600.00

EXHIBIT B
32 of 115

Task & Date	Hours	Rate	Amount
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 11/23/20	2.25	200.00	450.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 11/30/20	2.75	200.00	550.00
Total Hours 27.25		Total	\$5,450.00
		Balance Due	\$5,450.00



January 11, 2021

Cities Advocating Reasonable Deregulation
c/o Jim Finley
City of Longview
P.O. Box 1952
Longview, Texas 75606-1952

Re: PUC Docket No. 51415; *Application of Southwestern Electric Power Company for Authority to Change Rates*
Account # 806

Dear Jim:

Enclosed is our invoice for services provided to the Cities Advocating Reasonable Deregulation regarding the above referenced matter through December, 2020.

Please forward a copy of this invoice to the company.

If I can provide any further explanation about the services provided for you, please call me at (512) 474-1492.

Sincerely,

Alfred R. Herrera

ARH:ll
Enclosure

Herrera Law & Associates, PLLC
4400 Medical Parkway
Austin, TX 78756
512-474-1492

January 11, 2021

Invoice submitted to:

Cities Advocating Reasonable Deregulation

c/o Jim Finley

City of Longview

P.O. Box 1952

Longview, TX 75606-1952

In Reference To:

*Application of Southwestern
 Electric Power Company for
 Authority to Change Rates
 PUC DN 51415
 Acct #806*

STATEMENT FOR PROFESSIONAL SERVICES

Legal Fees:

		<u>Hrs/Rate</u>	<u>Amount</u>
12/01/20	Brennan Foley - Review and assess SOAH Order No. 2 setting procedural schedule and denying CARD's motion to compel	0.20 350.00/hr	70.00
12/02/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.70 145.00/hr	101.50
12/03/20	Brennan Foley - Research precedent re: plant retirement	1.80 350.00/hr	630.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.40 145.00/hr	58.00

Cities Advocating Reasonable Deregulation

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
12/04/20	Sergio E. Herrera - Reviewed depreciation testimony	2.40 250.00/hr	600.00
	Sergio E. Herrera - Reviewed COC/ROR testimony	1.40 250.00/hr	350.00
	Brennan Foley - Review TIEC RFIs re: ROR	0.10 350.00/hr	35.00
12/07/20	Brennan Foley - Review responses to OPUC RFIs re: payroll and incentive compensation	0.30 350.00/hr	105.00
	Brennan Foley - Review 45-day update	1.00 350.00/hr	350.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	3.50 145.00/hr	507.50
12/08/20	Sergio E. Herrera - Prep for zoom call with D. Garrett RE Rate Case	1.00 250.00/hr	250.00
	Sergio E. Herrera - Attended zoom call RE: D. Garrett's issues in Rate Case	1.00 250.00/hr	250.00
	Sergio E. Herrera -Reviewed Draft Preliminary Order	2.30 250.00/hr	575.00
	Brennan Foley - Review testimony and supporting schedules, conduct related research and participate in call with D. Garrett re: depreciation	2.50 350.00/hr	875.00
	Alfred R. Herrera - Assess effect of gen. retirements on depreciation expense	2.10 485.00/hr	1,018.50
12/09/20	Brennan Foley - Review responses to OPUC RFIs re: vegetation management (0.1) and taxes (0.1)	0.20 350.00/hr	70.00

Cities Advocating Reasonable Deregulation

Page 3

		<u>Hrs/Rate</u>	<u>Amount</u>
12/09/20	Brennan Foley - Review appeal of and motion to consolidate re: municipal rate ordinances	0.10 350.00/hr	35.00
	Alfred R. Herrera - Prep for and attend internal conference re: effect of gen. retirements on depreciation expense	0.60 485.00/hr	291.00
12/10/20	Sergio E. Herrera - Reviewed notes provided from consultants RE: impact of SWEPCO's decision to retire plants	1.10 250.00/hr	275.00
	Alfred R. Herrera - Research re: consultants to address prudence of decisions related to Dolet Hills mine	0.80 485.00/hr	388.00
12/11/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.40 145.00/hr	58.00
12/14/20	Brennan Foley - Review responses to Sierra Club RFIs	0.30 350.00/hr	105.00
	Brennan Foley - Review Sierra Club RFIs re: generation	0.10 350.00/hr	35.00
	Alfred R. Herrera - Prepare for and attend conference w/potential mining expert	1.60 485.00/hr	776.00
	Alfred R. Herrera - Review Brice, McMahon, & Baird re: treatment of Dolet Hills retirement	2.20 485.00/hr	1,067.00
12/15/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.40 145.00/hr	58.00
12/16/20	Sergio E. Herrera - Reviewed Comm. Botkin's Memo RE: PO	0.50 250.00/hr	125.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.50 145.00/hr	217.50
12/17/20	Sergio E. Herrera - Reviewed PO	1.20 250.00/hr	300.00

Cities Advocating Reasonable Deregulation

Page 4

		<u>Hrs/Rate</u>	<u>Amount</u>
12/17/20	Sergio E. Herrera - Reviewed testimonies (Bond, Jeffries, and McMahon) in RFP	4.10 250.00/hr	1,025.00
	Brennan Foley - Review Commissioner Bodkin memo re: preliminary order and monitor open meeting re: preliminary order	0.30 350.00/hr	105.00
12/18/20	Brennan Foley - Review OPUC RFIs re: generation (0.1) and ETSWD RFIs re: cost allocation/ rate design (0.1)	0.20 350.00/hr	70.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.20 145.00/hr	29.00
12/19/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.50 145.00/hr	72.50
12/21/20	Brennan Foley - Review and assess SWEPCO appeals of municipal actions and motion to consolidate	0.40 350.00/hr	140.00
	Alfred R. Herrera - Attend conference call re: effect of Dolet Hills and mine-closing costs on reconcilable fuel expense	0.60 485.00/hr	291.00
12/22/20	Brennan Foley - Review responses to OPUC RFIs re: payroll and incentive comp. (0.3) and storm reserve (0.2) and Staff RFIs re: cost of capital (0.3)	0.60 350.00/hr	210.00
	Brennan Foley - Review OPUC RFIs re: payroll (0.1) and Staff RFIs re: cost allocation and rate design (0.2)	0.30 350.00/hr	105.00
	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's Protective Order Certifications	0.40 145.00/hr	58.00
12/23/20	Alfred R. Herrera - Review scope of work for non-testifying consultant re: Dolet Hills and U-Area of mine	0.60 485.00/hr	291.00
12/24/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.30 145.00/hr	188.50

Cities Advocating Reasonable Deregulation

Page 5

		<u>Hrs/Rate</u>	<u>Amount</u>
12/28/20	Alfred R. Herrera - Attend conference call re: effect of Dolet Hills and mine-closing costs on reconcilable fuel expense	0.60 485.00/hr	291.00
12/29/20	Sergio E. Herrera - Reviewed and compared mining issues in pending rate case with Fuel Rec.	1.40 250.00/hr	350.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.50 145.00/hr	72.50
	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's Protective Order Certifications	0.40 145.00/hr	58.00
	Total Legal Fees:	44.10	\$12,932.50
	Expenses :		
12/01/20	Consultant Invoice - Resolve Utility Consulting Inv #000378		7,450.00
	Research on Westlaw for the month of December 2020		40.95
	Consultant Invoice - ReSolved Energy Consulting - Inv #4703		3,159.00
	Total expenses:		\$10,649.95
	TOTAL AMOUNT OF THIS BILL:		\$23,582.45
	Previous balance		\$91,701.55
	BALANCE DUE		\$115,284.00

**Resolve Utility Consulting PLLC**

101 Park Avenue
Suite 1125
Oklahoma City, Oklahoma 73102
(405) 249-1050

INVOICE**Bill To****Herrera Law & Associates, PLLC**

4400 Medical Parkway
Austin, TX 78701

Invoice#

INV-000378

Project Name

SWEPCO 51415

A handwritten signature, possibly 'S. G. 10', is written inside an oval.

Task & Date	Hours	Rate	Amount
Review application, testimony, exhibits and workpapers 12/01/20	3.50	200.00	700.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 12/03/20	3.75	200.00	750.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 12/07/20	3.50	200.00	700.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 12/10/20	4.00	200.00	800.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 12/14/20	2.75	200.00	550.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 12/17/20	3.00	200.00	600.00

EXHIBIT B
40 of 115

Task & Date	Hours	Rate	Amount
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 11/10/20	3.50	200.00	700.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 11/23/20	3.75	200.00	750.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 11/23/20	2.75	200.00	550.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 12/25/20	3.25	200.00	650.00
Review depreciation study, Iowa curve analysis, and reserve ande remaining life calculations 12/20/20	3.50	200.00	700.00
Total Hours 37.25		Total	\$7,450.00
		Balance Due	\$7,450.00

WESTLAW Research

December 2020

Account #	Research Time	X \$65.00/hr.	+ Excluded Charges	Total
		X \$65.00		
		X \$65.00		
806	0.63	X \$65.00		\$40.95
		X \$65.00		

ReSolved Energy Consulting, LLC

11044 Research Blvd, A-420

Austin, TX 78759

Invoice

DATE	INVOICE NUMBER
1/6/2021	4703

BILL TO

Herrera Law & Associates, PLLC

Alfred Herrera

4400 Medical Parkway

Austin, Texas 78756

PROJECT

HL SWEPCO RC 51415

DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	11.7	270.00	3,159.00
Work Completed thru - December 31, 2020		TOTAL DUE	\$3,159.00

Monthly Recap

Karl Nalepa

Date	Task	Hours
December 1, 2020	Review 45 day update.	0.80
December 2, 2020	Work on cost allocation.	1.50
December 3, 2020	Work on analysis.	1.00
December 7, 2020	Review responses to discovery.	0.80
December 8, 2020	Work on cost allocation.	0.70
December 9, 2020	Work on analysis.	0.50
December 14, 2020	Compile review issues and send to F. Herrera.	0.30
December 15, 2020	Review responses to discovery.	0.50
December 17, 2020	Review filing and work on analysis.	1.20
December 18, 2020	Review preliminary order. Review filing.	1.30
December 21, 2020	Review responses to discovery.	0.30
December 22, 2020	Work on rate design.	0.80
December 23, 2020	Work on analysis.	0.50
December 28, 2020	Review filing for fuel costs.	1.50
		11.70



February 9, 2021

Cities Advocating Reasonable Deregulation
c/o Jim Finley
City of Longview
P.O. Box 1952
Longview, Texas 75606-1952

**Re: PUC Docket No. 51415; *Application of Southwestern Electric Power Company for Authority to Change Rates*
Account # 806**

Dear Jim:

Enclosed is our invoice for services provided to the Cities Advocating Reasonable Deregulation regarding the above referenced matter through January, 2021.

Please forward a copy of this invoice to the company.

If I can provide any further explanation about the services provided for you, please call me at (512) 474-1492.

Sincerely,

Alfred R. Herrera

ARH:ll
Enclosure

PUC Docket No. 51415,
Application of Southwestern Electric Power Company for the Authority to
Change Rates

Expense Summary Sheet
Through January 2021

	<u>Previous</u> <u>Total</u>	<u>January</u>	<u>Cumulative</u> <u>Total</u>
Herrera Law & Associates, PLLC			
Attorney Fees	\$77,410.50	\$7,570.50	\$84,981.00
Expenses:			
Copy Expense			
Postage Expense			
FedEx Expense			
Fax Expense			
Court Fees			
Delivery Expense			
Research	\$123.50	\$34.45	\$157.95
Outside Copies			
Court Reporter/Transcript			
Travel-Airfare			
Travel Car/Gas/Parking			
Travel – Mileage			
Travel – Hotel			
Norwood Energy Consulting	\$10,890.00	\$7,920.00	\$18,810.00
ReSolved Energy Consulting	\$7,560.00	\$1,881.00	\$9,441.00
Garrett Group, Inc.	\$6,400.00	\$14,450.00	\$20,850.00
Resolve Utility Consulting	\$12,900.00		\$12,900.00
Total	\$115,284.00	\$31,855.95	\$147,139.95
Amount received			<u>(\$0.00)</u>
Balance			\$147,139.95

Herrera Law & Associates, PLLC
4400 Medical Parkway
Austin, TX 78756
512-474-1492

February 9, 2021

Invoice submitted to:

Cities Advocating Reasonable Deregulation

c/o Jim Finley

City of Longview

P.O. Box 1952

Longview, TX 75606-1952

In Reference To:

*Application of Southwestern
Electric Power Company for
Authority to Change Rates
PUC DN 51415
Acct #806*

STATEMENT FOR PROFESSIONAL SERVICES

Legal Fees:

		<u>Hrs/Rate</u>	<u>Amount</u>
01/05/21	Mariann Wood - Prepared CARD's 5th Set of RFIs; Reviewed and updated case file; Updated Discovery spreadsheet	0.80 145.00/hr	116.00
	Brennan Foley - Review and revise RFIs re: payroll	0.30 350.00/hr	105.00
	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's 5th Set of RFIs to SWEPCO	0.60 145.00/hr	87.00
01/07/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.10 145.00/hr	14.50

Cities Advocating Reasonable Deregulation

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
01/07/21	Brennan Foley - Review SWEPCO's proof of notice	0.20 350.00/hr	70.00
01/11/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.80 145.00/hr	116.00
01/12/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.00 145.00/hr	145.00
01/14/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.30 145.00/hr	43.50
	Sergio E. Herrera - Reviewed discovery and updated filings on interchange	0.50 250.00/hr	125.00
01/15/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.50 145.00/hr	72.50
	Brennan Foley - Review responses to CARD RFIs re: payroll and incentive comp. (0.5), taxes (0.2) and vegetation management (0.3)	1.00 350.00/hr	350.00
01/18/21	Mariann Wood - Updated discovery spreadsheet	2.00 145.00/hr	290.00
01/19/21	Brennan Foley - Review Nucor Steel RFIs re: cost allocation/rate design (0.1) and TIEC RFIs re: SPP issues (0.1) and responses to ETSWD RFIs re: cost allocation and rate design (0.1)	0.30 350.00/hr	105.00
01/20/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.30 145.00/hr	43.50
	Brennan Foley - Review responses to PUC RFIs re: payroll	0.20 350.00/hr	70.00
	Alfred R. Herrera - Review various SWEPCO responses to discovery	2.60 485.00/hr	1,261.00

		<u>Hrs/Rate</u>	<u>Amount</u>
01/21/21	Brennan Foley - Review responses to Staff RFIs re: cost allocation and rate design	0.30 350.00/hr	105.00
	Brennan Foley - Review SWEPCO motion to consolidate and appeal of muni. actions	0.20 350.00/hr	70.00
	Sergio E. Herrera - Reviewed testimony and WP RE: potential split of Oxbow. Mine issue	1.10 250.00/hr	275.00
01/22/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.20 145.00/hr	29.00
	Brennan Foley - Draft denial resolution and AIS	2.40 350.00/hr	840.00
01/23/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.50 145.00/hr	217.50
01/25/21	Brennan Foley - Draft denial resolution and AIS	2.30 350.00/hr	805.00
	Alfred R. Herrera - Review and revise draft denial resolution and accompanying agenda-info sheet	1.20 485.00/hr	582.00
01/26/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.90 145.00/hr	130.50
	Brennan Foley - Review TIEC RFIs re: SPP issues (0.1) and responses to CARD RFIs re: payroll (0.3) and OPUC RFIs re: storm reserve (0.2)	0.60 350.00/hr	210.00
01/27/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Prepared CARD's 6th Set of RFIs	0.80 145.00/hr	116.00
	Brennan Foley - Review Staff RFIs re: generation (0.1) and taxes (0.1)	0.20 350.00/hr	70.00

Cities Advocating Reasonable Deregulation

Page 4

		<u>Hrs/Rate</u>	<u>Amount</u>
01/27/21	Brennan Foley - Research precedent on case issues	1.20 350.00/hr	420.00
01/28/21	Brennan Foley - Research precedent re: storm reserve	0.50 350.00/hr	175.00
	Sergio E. Herrera - Reviewed CARD Depreciation RFIs	0.50 250.00/hr	125.00
01/29/21	Brennan Foley - Review CARD RFIs re: depreciation (0.2) and TIEC RFIs re: SPP issues (0.1) and Staff RFIs re: generation issues (0.1)	0.40 350.00/hr	140.00
	Leslie Lindsey - File and serve CARD's 6th Set of RFIs to SWEPCO	0.20 145.00/hr	29.00
01/30/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.50 145.00/hr	217.50
	Total Legal Fees:	27.50	\$7,570.50
	Expenses :		
12/01/20	Consultant Invoice - Garrett Group Consulting, Inc.		14,450.00
	Consultant Invoice - Norwood Energy Consulting, LLC Inv #SWPRate DEC20		5,060.00
01/01/21	Consultant Invoice - Norwood Energy Consulting, LLC Inv #SWPRate JAN21		2,860.00
	Consultant Invoice - ReSolved Energy Consulting, LLC Inv #4728		1,881.00
	Research on Westlaw for the month of January 2021		34.45
	Total expenses:		\$24,285.45
	TOTAL AMOUNT OF THIS BILL:		\$31,855.95

Cities Advocating Reasonable Deregulation

Page 5

	<u>Amount</u>
Previous balance	\$115,284.00
BALANCE DUE	<u>\$147,139.95</u>

GARRETT GROUP CONSULTING, INC.

4028 OAKDALE FARM CIRCLE
EDMOND, OK 73013

TELEPHONE (405) 239-2226

E-MAIL MGARRETT@GARRETTGROUPLLC.COM

January 21, 2021

Alfred R. Herrera
Herrera Law & Associates, PLLC
816 Congress Avenue, Suite 950
Austin, Texas 78701**RE: SWEPCO 2020 Rate Case; Docket No. PUC 51415**

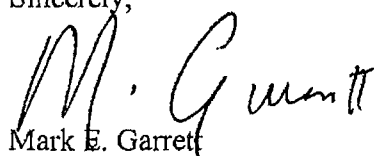
Dear Freddy:

Our invoice for professional services in December 2020 in connection with the above-referenced case follows:

I.	Professional Services:	
A.	Mark Garrett JD, CPA – 36 hours at \$250.00 per hour (Details in Attachment A)	\$9,000.00
B.	Heather Garrett JD, CPA – 10 hours at \$200.00 per hour (Details in Attachment B)	\$2,000.00
C.	Ed Farrar CPA – 13 hours at \$150.00 per hour (Details in Attachment C)	\$1,950.00
D.	Garry Garrett – 12 hours at \$125.00 per hour (Details in Attachment D)	\$1,500.00
II.	Expenses:	
	Office Expenses	<u>N/C</u>
III.	Total This Invoice:	\$14,450.00

We appreciate the opportunity to work with you on this case. Please call me if you have any questions.

Sincerely,


Mark E. Garrett
Attachments

MEG/gg

Attachment A**Consulting Tasks for SWEPCO 2020 Rate Case**
*Docket No. PUC 51415**(Mark Garrett)***December 2020 – 36 Hours**

Date	Task	Hours
1	Review testimony and exhibits	2
9	Review testimony and exhibits	4
11	Review 45-day update	6
15	Review discovery; develop issues	4
17	Review discovery; develop issues	4
18	Review discovery; develop issues	4
22	Review discovery; develop issues; review prior cases	6
29	Review discovery; develop issues; review prior cases	6
Total		36

Attachment B**Consulting Tasks for *SWEPCO 2020 Rate Case***
*Docket No. PUC 51415**(Heather Garrett)***December 2020 – 10 Hours**

Date	Task	Hours
12	Review 45-day update	4
14	Work on exhibits	3
16	Work on exhibits	3
Total		10

Attachment C

Consulting Tasks for SWEPSCO 2020 Rate Case
Docket No. PUC 51415

(Edwin Farivar)

December 2020 – 13 Hours

Date	Task	Hours
9	Review 45-day update	1
15	Review discovery responses, rate case issues	2
16	Review exhibits and work papers, perform analysis	5
17	Review exhibits and work papers, perform analysis	3
28	Review discovery responses, rate case issues	1
29	Review discovery responses, rate case issues	1
Total		13

Attachment D

Consulting Tasks for SWEPCO 2020 Rate Case
Docket No. PUC 51415

(Garry Garrett)

December 2020 – 12 Hours

Date	Task	Hours
10	Develop issues	2
15	Develop issues	4
16	Develop issues	4
17	Develop issues	2
Total		12

Norwood Energy Consulting, L.L.C.

P. O. Box 30197
Austin, Texas 78755-3197
scott@scottnorwood.com
(512) 297-1889

Mr. Alfred R. Herrera
Herrera Law & Associates, PLLC
4400 Medical Parkway
Austin, Texas 78756

Date: 2-9-21
Tax ID #: 26-2374359
Invoice#: SWPRate DEC20

Re: SWEPCO Base Rate Case Analysis - PUC Docket No. 51415

806

Statement for professional services rendered 12-1-20 through 12-31-20

12-07-20	Reviewed SWEPCO RFI responses	5.0 hrs
12-10-20	Reviewed coal and lignited unit performance issues	6.5 hrs
12-15-20	Reviewed SWEPCO Dolet Hills fuel and retirement issues	6.0 hrs
12-16-20	Reviewed RFI responses; reviewed previous orders and testimony on lignite unit performance	<u>5.5 hrs</u>
Total hours:		23.0 hrs

Total due: 23.0 hours at \$220 per hour = \$5,060

Thank you for the opportunity to assist with this project.

Norwood Energy Consulting, L.L.C.

P. O. Box 30197
Austin, Texas 78755-3197
scott@scottnorwood.com
(512) 297-1889

Mr. Alfred R. Herrera
Herrera Law & Associates, PLLC
4400 Medical Parkway
Austin, Texas 78756

Date: 2-9-21
Tax ID #: 26-2374359
Invoice#: SWPRate JAN21

Re: SWEPCO Base Rate Case Analysis - PUC Docket No. 51415

806

Statement for professional services rendered 1-1-21 through 1-31-21

1-11-21	Reviewed SWEPCO testimony and purchased power schedules; reviewed production capital additions	5.0 hrs
1-15-21	Reviewed lignite unit performance; reviewed imputed capacity value for renewable PPAs and SWEPCO capacity requirements	3.5 hrs
1-20-21	Reviewed Dolet Hills and Pirkey early retirement issues	<u>4.5 hrs</u>
Total hours:		13.0 hrs

Total due: 13.0 hours at \$220 per hour = \$2,860

Thank you for the opportunity to assist with this project.

Invoice**ReSolved Energy Consulting, LLC**

11044 Research Blvd, A-420

Austin, TX 78759

DATE	INVOICE NUMBER
2/4/2021	4728

BILL TO

Herrera Law & Associates, PLLC

Alfred Herrera

4400 Medical Parkway

Austin, Texas 78756

PROJECT

HL SWEPCO RC 51415

DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	4.1	270.00	1,107.00
Consulting (Cromleigh)	4.3	180.00	774.00
Total Labor			1,881.00
Work Completed thru - January 29, 2021		TOTAL DUE	\$1,881.00

Monthly Recap

Karl Nalepa

Date	Task	Hours
January 8, 2021	Review discovery.	0.30
January 11, 2021	Work on analysis.	0.80
January 12, 2021	Work on analysis.	0.70
January 14, 2021	Review responses to discovery.	0.50
January 21, 2021	Work on analysis.	0.80
January 22, 2021	Review responses to discovery.	0.50
January 29, 2021	Review discovery.	0.50

4.10

Monthly Recap

Erin Cromleigh

Date	Task	Hours
January 4, 2021	Review filing.	1.90
January 5, 2021	Review filing. Compile discovery.	2.40
		4.30

WESTLAW Research

January 2021

Account #	Research Time	X \$65.00/hr.	+ Excluded Charges	Total
		X \$65.00		
806	.53	X \$65.00		\$34.45



March 17, 2021

Cities Advocating Reasonable Deregulation
c/o Jim Finley
City of Longview
P.O. Box 1952
Longview, Texas 75606-1952

**Re: PUC Docket No. 51415; *Application of Southwestern Electric Power Company for Authority to Change Rates*
Account # 806**

Dear Jim:

Enclosed is our invoice for services provided to the Cities Advocating Reasonable Deregulation regarding the above referenced matter through February, 2021.

Please forward a copy of this invoice to the company.

If I can provide any further explanation about the services provided for you, please call me at (512) 474-1492.

Sincerely,

Alfred R. Herrera

ARH:ll
Enclosure

PUC Docket No. 51415,
Application of Southwestern Electric Power Company for the Authority to
Change Rates

Expense Summary Sheet
Through February 2021

	<u>Previous</u> <u>Total</u>	<u>February</u>	<u>Cumulative</u> <u>Total</u>
Herrera Law & Associates, PLLC			
Attorney Fees	\$84,981.00	\$29,862.50	\$114,843.50
Expenses:			
Copy Expense			
Postage Expense			
FedEx Expense			
Fax Expense			
Court Fees			
Delivery Expense			
Research	\$157.95	\$99.45	\$257.40
Outside Copies			
Court Reporter/Transcript			
Travel-Airfare			
Travel Car/Gas/Parking			
Travel – Mileage			
Travel – Hotel			
Norwood Energy Consulting	\$18,810.00	\$7,810.00	\$26,620.00
ReSolved Energy Consulting	\$9,441.00	\$6,246.00	\$15,687.00
Garrett Group, Inc.	\$20,850.00	\$22,425.00	\$43,275.00
Resolve Utility Consulting	\$12,900.00	\$17,650.00	\$30,550.00
J. Randall Woolridge		\$28,927.50	\$28,927.50
Total	\$147,139.95	\$113,020.45	260,160.40
Amount received			<u>(\$0.00)</u>
Credit			<u>(\$776.00)</u>
Balance			\$259,384.40

Herrera Law & Associates, PLLC
PO Box 302799
Austin, TX 78703
512-474-1492

March 17, 2021

Invoice submitted to:

Cities Advocating Reasonable Deregulation
c/o Jim Finley
City of Longview
P.O. Box 1952
Longview, TX 75606-1952

In Reference To:

*Application of Southwestern
Electric Power Company for
Authority to Change Rates
PUC DN 51415
Acct #806*

STATEMENT FOR PROFESSIONAL SERVICES

Legal Fees:

		<u>Hrs/Rate</u>	<u>Amount</u>
11/30/20	Brennan Foley - Review Sierra Club's motion to intervene	0.10 350.00/hr	35.00
	Brennan Foley - Review responses to Staff RFIs re: weather normalization (0.2) and vegetation management (0.2)	0.40 350.00/hr	140.00
02/03/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.10 145.00/hr	159.50
02/08/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.60 145.00/hr	87.00

Cities Advocating Reasonable Deregulation

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
02/09/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.10 145.00/hr	14.50
	Leslie Lindsey - Prepare, format, CARD's 7th Set of RFIs to SWEPCO	0.30 145.00/hr	43.50
02/10/21	Brennan Foley - Review and revise RFIs and correspond with S. Norwood	0.70 350.00/hr	245.00
	Sergio E. Herrera - Reviewed S. Norwood RFI Draft	0.70 250.00/hr	175.00
	Sergio E. Herrera - Communicated with CARD witnesses RE: issues/SWEPCO testimonies	0.30 250.00/hr	75.00
	Sergio E. Herrera - Drafted table RE CARD witnesses issues	0.40 250.00/hr	100.00
	Sergio E. Herrera - Reviewed SWEPCO testimony, WPs, and Schedules RE CA/RD	6.30 250.00/hr	1,575.00
	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's 7th Set of RFIs to SWEPCO	0.20 145.00/hr	29.00
02/11/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.50 145.00/hr	72.50
	Brennan Foley - Review responses to CARD RFIs re: generation and discuss with S. Norwood; confer with P. Pearsall re: same	0.50 350.00/hr	175.00
	Brennan Foley - Conduct research re: DN 46449 appeal issues and TCRF issues and correspond with S. Norwood	1.50 350.00/hr	525.00
	Sergio E. Herrera - Reviewed direct testimonies RE: CARD witness identified issues	2.90 250.00/hr	725.00
	Leslie Lindsey - Emails with consultant, attorney and SWEPCO regarding missing attachments to RFIs	0.30 145.00/hr	43.50

Cities Advocating Reasonable Deregulation

Page 3

		<u>Hrs/Rate</u>	<u>Amount</u>
02/12/21	Brennan Foley - Review TIEC RFIs re: Welsh Unit 2 issues	0.10 350.00/hr	35.00
	Sergio E. Herrera - Reviewed SWEPCO direct testimonies RE: CARD Witness issues	2.30 250.00/hr	575.00
	Sergio E. Herrera - Conducted research RE: status of appeal of 40443 per S. Norwood question	0.50 250.00/hr	125.00
	Alfred R. Herrera - Review recent credit-rating agency reports re: AEP/SWEPCO and similar utilities	2.30 485.00/hr	1,115.50
02/15/21	Alfred R. Herrera - Review various SWEPCO responses to discovery (CARD 1st-PPA Cap costs and related direct testimony)	2.60 485.00/hr	1,261.00
02/16/21	Sergio E. Herrera - Reviewed SWEPCO Direct testimony RE: depreciation and cost allocation	4.30 250.00/hr	1,075.00
	Alfred R. Herrera - Review various SWEPCO responses to discovery (CARD 2nd-Plant Cap Factors and related direct testimony)	2.80 485.00/hr	1,358.00
02/17/21	Brennan Foley - Review RFI responses re: generation and consult with S. Norwood	0.80 350.00/hr	280.00
	Alfred R. Herrera - Review various SWEPCO responses to discovery (CARD 2nd-New Cap Addtns and related direct testimony)	4.10 485.00/hr	1,988.50
02/18/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.80 145.00/hr	116.00
	Brennan Foley - Prepare RFIs re: payroll	0.20 350.00/hr	70.00
	Brennan Foley - Review RFI responses and correspond with P. Pearsall re: same	0.60 350.00/hr	210.00

Cities Advocating Reasonable Deregulation

Page 4

		<u>Hrs/Rate</u>	<u>Amount</u>
02/18/21	Alfred R. Herrera - Review various SWEPCO responses to discovery (CARD 2nd-system reliability/interruptions and related direct testimony)	3.90 485.00/hr	1,891.50
	Leslie Lindsey - Prepare, format, file and serve on all parties CARD's 8th Set of RFIs to SWEPCO	0.50 145.00/hr	72.50
02/19/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.40 145.00/hr	203.00
	Brennan Foley - Review OPUC RFIs re: generation (0.1), responses to OPUC RFIs re: incentive compensation (0.1), responses to Staff RFIs re: generation (0.1) and vegetation management (0.1), taxes (0.1) and depreciation (0.1), TIEC RFIs re: CA/RD (0.3) and CARD RFIs re: depreciation (0.5) and generation (0.1)	1.50 350.00/hr	525.00
	Sergio E. Herrera - Reviewed updated Discovery requests from Sierra Club	0.50 250.00/hr	125.00
	Sergio E. Herrera - Reviewed SWEPCO's responses to CARD and TIEC's First RFI	1.80 250.00/hr	450.00
	Alfred R. Herrera - Review various SWEPCO responses to discovery (CARD 2nd-Veg Management, SAIDI/SAIFI repts/data and related testimony)	4.10 485.00/hr	1,988.50
02/22/21	Brennan Foley - Correspond with P. Pearsall and S. Norwood re: CARD RFIs	0.30 350.00/hr	105.00
	Sergio E. Herrera - Reviewed SWEPCO direct testimony/WP RE: Allocation and weather norm.	4.50 250.00/hr	1,125.00
	Sergio E. Herrera - Reviewed SWEPCO direct testimony/WP RE: depreciation issues	2.90 250.00/hr	725.00
	Alfred R. Herrera - Review SWEPCO responses to RFIs (CARD 3rd-Cost of Capital and related dir. testimonies)	2.60 485.00/hr	1,261.00

Cities Advocating Reasonable Deregulation

Page 5

		<u>Hrs/Rate</u>	<u>Amount</u>
02/22/21	Alfred R. Herrera - Review credit-rating reports re: SWEPCO	1.20 485.00/hr	582.00
02/23/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.80 145.00/hr	261.00
	Sergio E. Herrera - Reviewed SWEPCO Direct RE: issues pertaining to Pirkey/Dolet	3.10 250.00/hr	775.00
	Alfred R. Herrera -Review SWEPCO responses to RFIs (CARD 3rd-Cost of Capital and related dir. testimonies)	1.70 485.00/hr	824.50
02/24/21	Sergio E. Herrera - Reviewed SWEPCO Application RE: Imputed Capacity	1.20 250.00/hr	300.00
	Sergio E. Herrera - Reviewed SWEPCO Application RE: Plant Operations	3.10 250.00/hr	775.00
	Alfred R. Herrera - Review Sierra Club's 3rd and TIEC's 8th RFIs to SWEPCO	1.20 485.00/hr	582.00
	Alfred R. Herrera - Review SWEPCO responses to RFIs (CARD 3rd-Cost of Capital and related dir. testimonies-D'Ascendis)	2.20 485.00/hr	1,067.00
	Alfred R. Herrera - Review SWEPCO responses to RFIs (CARD 4th RFIs-Post TY changes and related testimonies)	1.80 485.00/hr	873.00
02/25/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.20 145.00/hr	29.00
	Brennan Foley - Review Staff RFIs re: vegetation management (0.1) and incentive compensation (0.1), OPUC RFIs re: taxes (0.1) and generation (0.1), Sierra Club RFIs re: generation (0.2), ETEc RFIs re: generation (0.1) and accountng issues (0.1), TIEC RFIs re: cost of capital (0.1) and responses to Nucor Steel RFIs re: CA/RD (0.2), TIEC RFIs re: CA/RD (0.2), Sierra Club RFIs re: generation (0.3), ETSWD RFIs re: CA/RD (0.1)	1.70 350.00/hr	595.00

Cities Advocating Reasonable Deregulation

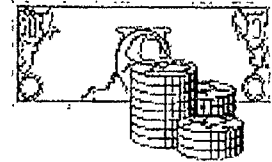
Page 6

		<u>Hrs/Rate</u>	<u>Amount</u>
02/25/21	Brennan Foley - Conduct research re: cost of capital	0.50 350.00/hr	175.00
	Alfred R. Herrera - Review TIEC's 9th RFI to SWEPCO	0.70 485.00/hr	339.50
	Alfred R. Herrera - Review SWEPCO's responses to discovery (CARD 4th-Payroll expenses and related testimonies)	1.40 485.00/hr	679.00
02/26/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.60 145.00/hr	87.00
	Sergio E. Herrera - Reviewed SWEPCO Direct testimony/WP/Schedules RE: retirement issues	2.10 250.00/hr	525.00
	Sergio E. Herrera - Reviewed SWEPCO Direct testimony/WP RE: Cost of Cap./CS/DR	1.80 250.00/hr	450.00
02/28/21	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	0.30 145.00/hr	43.50
	Total Legal Fees:	88.90	\$29,862.50
	Expenses :		
10/01/20	Consultant Invoice - Randy Woolridge Inv #First Billing		28,927.50
01/01/21	Consultant Invoice - ReSolve Utility Consulting Inv-000399		8,400.00
	Consultant Invoice - Garrett Group Consulting, Inc.		22,425.00
02/01/21	Consultant Invoice - ReSolve Utility Consulting Inv-000400		9,250.00
	Consultant Invoice - Norwood Energy Consulting, LLC Inv #SWPRate Feb21		7,810.00
	Consultant Invoice - ReSolved Energy Consulting, LLC Inv #4736		6,246.00

Cities Advocating Reasonable Deregulation

Page 7

	<u>Amount</u>
02/01/21 Research on Westlaw for the month of February 2021	99.45
Total expenses:	\$83,157.95
TOTAL AMOUNT OF THIS BILL:	\$113,020.45
Previous balance	\$147,139.95
3/15/2021 Credit ~ 10/16/20 Charge : Alfred R. Herrera - Various communications with parties and prepare summary of proposed settlement re: SPS's withdrawal of application	(\$776.00)
Total payments and adjustments	(\$776.00)
BALANCE DUE	\$259,384.40



INVOICE

FROM: J. Randall Woolridge, Ph.D.
120 Haymaker Circle
State College, PA 16801

TO: Herrera & Boyle, PLLC
816 Congress Ave., Suite 1250
Austin, Tx 78701

RE: Southwestern Electric Power Company
Docket No. 51415

806

DATE: 3/18/2021
First Billing

I. PROFESSIONAL SERVICES AND OVERHEAD			Issue	Phase	
A. J. RANDALL WOOLRIDGE			Code	Code	
DATE	DESCRIPTION				HOURS
10 / 1 / 2020	Review Case Documents and Filing	6	A		2.0
	Review Company Background	6	D		1.5
	Review previous Rate Cases	6	D		2.0
	Review Testimonies - D'Ascendis, Hawkins	6	G		3.0
	Prepare -Send Interrogatories - 4X	6	B		2.5
Various	Review Email and Related Documents	6	D		1.0
Various	Research Rate of Return Issues	6	D		1.0
Various	Review Case with Counsel and Consultants	6	D		0.0
HOURS					13.0
11 / 1 / 2020	Review Documents	6	A		2.0
	Review Capital Market Data	6	D		2.0
	Prepare/Review Issues List	6	D		2.5
	Review Data Responses	6	B		1.0
	Review Credit Reports	6	D		2.0
Various	Review Email and Related Documents	6	D		1.0
Various	Research Rate of Return Issues	6	D		0.0
Various	Review Case with Counsel and Consultants	6	D		0.0
HOURS					10.5
12 / 1 / 2020	Review Documents	6	A		1.0
	Review Capital Market Data	6	D		1.0
	Review Data Responses	6	B		1.5
Various	Review Email and Related Documents	6	D		1.0
Various	Research Rate of Return Issues	6	D		0.0
Various	Review Case with Counsel and Consultants	6	D		0.0

HOURS						4.5
1 /	1 /	2021	Review Documents	6	A	1.0
			Review Capital Market Data	6	D	1.0
			Review D'Ascendis Testimonies	6	D	2.0
Various			Review Email and Related Documents	6	D	1.0
Various			Research Rate of Return Issues	6	D	0.0
Various			Review Case with Counsel and Consultants	6	D	0.0
HOURS						5.0
2 /	1 /	2021	Review Documents	6	A	1.5
			Review Capital Market Data	6	D	2.0
			Update Capital Market Data - CRs, DPS,EPS	6	D	2.5
			Collect Cost of Capital Data	6	E	1.0
			Prepare Proxy Group	6	E	2.0
			Evaluate Utility and Capital Structure Issues	6	D	2.0
			Prepare US ROE Rate Case Study	6	D	3.0
			Prepare TX ROE Study	6	D	3.5
			Prepare Exhibits - 3X	6	E	4.0
			Prepare Testimony - 3X	6	E	4.0
			Review Data Request Responses	6	B	1.0
Various			Review Email and Related Documents	6	D	1.0
Various			Research Rate of Return Issues	6	D	4.0
Various			Review Case with Counsel and Consultants	6	D	0.0
HOURS						31.5
3 /	1 /	2021	Review Documents	6	A	1.5
			Review Capital Market Data	6	D	1.5
			Review Data Responses	6	B	2.0
			Collect Cost of Capital Data	6	E	2.5
			Prepare Exhibits - 3X	6	E	6.0
			Prepare Testimony - 3X	6	E	10.0
			Update Capital Market Summary	6	E	3.0
			Prepare DCF Study - Electric Proxy Group	6	E	4.0
			Prepare CAPM Study - Electric Proxy Group	6	E	2.5
			Prepare/Revise/Send Testimony/Appendices -	6	E	2.0
Various			Review Email and Related Documents	6	D	1.0
Various			Research Rate of Return Issues	6	D	1.0
Various			Review Case with Counsel and Consultants	6	D	0.0
HOURS						37.0
TOTAL HOURS						101.5
PROFESSIONAL SERVICES @ \$285.00/HOUR						\$28,927.50
II. EXPENSES						
a	Travel					
b.	1. Office Expenses (Fed Ex)					
TOTAL EXPENSES						
III. TOTAL BILLING						
TOTAL PROFESSIONAL SERVICES PLUS EXPENSES						\$28,927.50
TOTAL BILLING						\$28,927.50